FOUR D PROPERTIES, INC.

6136 MISSION GORGE RD., #230 SAN DIEGO, CA 92120 Telephone (619) 283-0588 Fax (619) 283-0023

1/19/05

Re: GRANTULLI REDEVELAPEMENT.

DEAR MR REED,

DDI

I wave made copies of various pages of the ETR with my comments for your rewe's.

Respectfully, Sin Gallebal

DANIEL J. DALLENBACH Broker

6136 Mission Gorge Rd., #230 San Diego, CA 92120

VALLEY VIEW PROPERTIES

A division of
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RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005

Response to Comment DD1:

Please refer to responses to comments DD2 through DD13.

Executive Summary

Executive Summary

Project Description

The proposed project is the adoption and subsequent implementation of the Grantville Redevelopment Project, located in portions of the Navajo, Tierrasanta, and College Area Community Planning Areas of the City of San Diego. The primary discretionary action associated with the proposed project is the adoption of the Grantville Redevelopment Project Area by the Redevelopment Agency of the City of San Diego. The Redevelopment Agency proposes the establishment of the Grantville Redevelopment Project Area as a catalyst to reverse the physical and economic blight in the Project Area. A variety of redevelopment activities will be implemented subsequent to the adoption of the Redevelopment Project Area in order to achieve the objectives of the project. These activities will include, but not be limited to, the acquisition of land or building sites, improvement of land and building sites, rehabilitation of structures, improving public facilities and infrastructure, expanding employment opportunities, expanding recreational opportunities in the Project Area, and providing other public improvements and landscaping.

The Grantville Redevelopment Project will be implemented in accordance with the California Community Redevelopment Law (CCRL), Health and Safety Code Section 33000 et. seq. Approval of the project will implement a plan, with subsequent redevelopment, and private and public improvements within the Redevelopment Project Area encompassing approximately 970 acres of land.

Redevelopment is defined pursuant to Section 33020 of the CCRL as "the planning, development, replanning, redesign, clearance, reconstruction, or rehabilitation or any combination of these, of all or part of a survey area, and the provision of those residential, commercial, industrial, public, or other structures or spaces as may be appropriate or necessary in the interest of the general welfare, including recreational and other facilities incidental or appurtenant to them." Redevelopment also includes the activities described in Section 33021 of the CCRL which comprise the following:

- Alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a Project Area;
- Provision of open space and public or private recreation areas; and,
- Replanning or redesign or development of undeveloped areas in which either of the following conditions exist:
 - 1) the areas are stagmant or improperly utilized because of defective or inadequate street layout, faulty lot layout in relation to size, shape, accessibility or usefulness, or for other couses; or
- 2) the area requires replanning and land assembly for development in the interest of the general welfare because of widely scattered ownership, tax delinquency or other reasons.

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Grantville Redevelopment Project Draft Program EIR

DD2

December 13, 2004

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD2:

This section of the EIR quotes language directly from CCRL. The law in other places addresses public improvements including roadways and infrastructure. Specifically, Section 33030C defines blight as including:

"A blighting area also may be one that contains the conditions described in subdivision (b) and is, in addition, characterized by the existence of inadequate public improvements, parking facilities, or utilities."

Further provisions under Section 33445 allow the agency to construct public infrastructure improvements, subject to certain findings:

"(a) Notwithstanding Section 33440, an agency may, with the consent of the legislative body, pay all or a part of the value of the land for and the cost of the installation and construction of any building, facility, structure, or other improvement which is publicly owned either within or without the project area,

Flooding, in and of itself, is not a criteria for blight. However, flooding issues may indirectly lead to blight conditions. Flooding and inadequate infrastructure decreases incentives for investment in properties, which in turn, contribute to overall blighting conditions.

TABLE S-1

Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Miligation Measure(s)	Significance of
		Impact(s) After
Section 4.2 - Transportation/Circulation	是一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个	TO SAME TO SERVE
Proposec recevelopment activities based on existing community pain alone uses are anticipated to add 31,660 and with the anticipated to add 31,660 accurring outing alone the activation network with 3280 fips occurring units alone and accurring auting alone alone about the tollowing roadway segments would be significantly impacted. Firians Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F): Finals Road from Rancho Mission Road to Santo Road (LOS F): Foilmount Avenue from I-8 East Bound Olf Ramp to Carnino Del Rio North (LOS F): Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS F): Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F): and. Mission Gorge Road from Firians Road to Zion Avenue (LOS F): and. The following intersections would be significantly impacted by the proposed redevelophemat: Firians & H.15 South Bound Ramps (PM Peak hour): Firians & H.15 South Bound Ramps (PM Peak hour): Formount Avenue (AM and PM Peak hours): and Peak hours): Formount Avenue (AM and PM Peak hours): and Healthours! Carnino De. Rio & He West Bound Olf Ramp & Fairmount Avenue (AM Peak hours): and Healthours! Avenue (AM Peak hours): and Healthours! Ramp meter analysis was also conducted for the proposec	Hilled within the Navigo and Terrasmia Community Plans should be sufficient financial resources become available through the proposed recevelopment project area. These improvements of Gorge Road to a six-farre facility north of zion Avenue with no except at signalized intersections. In Gorge Road to a six-farre facility north of zion Avenue with no except at signalized intersections. In Congress Road to a six-farre major street between Fairmount interstate 8. HAMPRILS BETWEEN FAIRMANT	Significant and Unavaidable
Peak Hours for the Sounds of the Sound of th		

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December 13, 2004

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD3:

Please refer to EIR page 4.2-21 which provides a description of the improvements identified in the Navajo and Tierrasanta Community Plans. Proposed mitigation would include both widening Mission Gorge Road as well as improving existing 6-lane segments of Mission Gorge Road so that the facility operates as a 6-lane major roadway.

As stated on EIR page 4.2-2, the segment of Mission Gorge Road between Friars Road and Mission Gorge Road is classified as a 6-lane primary arterial transitioning to a 6lane major roadway. This includes the segment between Fairmont Avenue and Zion Road. No further improvement is recommended for this specific segment as it current is improved to a 6-lane primary arterial.

Impact(s)	Recommended Miligation Measure(s)	À
(p.luo) securces (conf.d.)		
	4. Final Results Report a. Prior to the release of the Final Results Report a. Prior to the release of the grading bond, two copies of the Final Results Report	
	lever, it negative), which describes the results, analysts, and condustons or the above Paleontalogical Manitaring Pragram (with appropriate graphics) shall be	
	submitted to MMC for approval by the ADD of LDR. D. MMC shall notify the RE or BI, as appropriate, of receipt of the final Results	
	Report	Control of the Contro
Section 4.10 – Aesthetics	a) as recivenoment octivities proceed within the Project Area, each individual	Less Than
reture redevelopment activities within the redect may the result in significant oesthetic impacts.		Significant
	the development standards of the City of San Diego Land Development Code and	
	ine adoptied design goldenings of the community of the projects shall incorporate appropriate design defails and principals consistent with	
	the Navajo and Tierrasanta Community Plans, including:	
	. The rear elevations of buildings which face the San Diego Kiver of are Visible from the creek thanks he as well-defailed and visually interesting as the front	
	elevolions;	
	 Buildings developed adjacent to the river should be set back from the river to 	
	avaid glare and shading impacts to the habitat;	
	Improve the appearance of the existing strip commercial development on the commercial development of the commercial devel	
	Mission Golge Road Derweer, interactive of direction states of reading amproving landscaping and architectural design, providing consistent building	
	setbacks and providing adequate off-street parking:	
	 Site design should provide adequate visual buffers surrounding uses, such as 	
	with the use of landscaping or grade separation.	
	Develop commercial dreas which have desirably districtive documes in their desirable desirable.	
C. Will And House	esign, appearance and operation. Francisc that inclustrial appearance and effects of industrial uses are compatible.	
SCHALLING INTO INCHINE		
DR AS AMENDOO?		
40	Development along Mission Gorge Road shall comply with the regulations The Community Plan Implementation Overlay 20th (CPIOZ) and	
	• Future development of areas within the Tierrasanta Community that abut the	
	Mission Trials Regional Park should be sensitive to it, as proposed within the	
	Urban Design Element of the Tierrasonto Community Plan.	

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD4:

Recommendations identified in EIR Mitigation Measure A1 are taken verbatim from the adopted Navajo Community Plan's goals and recommendations (see EIR page 4.10-2). As such, no change is proposed.

2.0 -- 1

nental Setting

ogical resources sensitivity. The Friars Formation has a high resources sensitivity and the Santiago anics, within the Project Area, has a marginal resource sensitivity.

2.2.10 Aesthetics

Portions of Project Area have public views to the relatively natural landscape of the San Diego River and Mission Trails Regional Park to the north and northeast. However, a majority of the Project Area is urban and characterized by older development and blighted conditions.

2.2.11 Water Quality/Hydrology

The San Diego River is the primary hydrologic feature within the Project Area. The San Diego River bisects the northwestern portion of Subarea B and generally forms the western boundary of the Project Area as it flows from the southwest through the Navajo Community into Mission Valley. The San Diego River originates in the mountains northwest of the historic town of Julian and runs southwestward through an unincorporated, largely uninhabited area of San Diego County before entering El Capitan Reservoir. Downstream of El Capitan Reservoir, the river flows westward through the Cities of Santee and San Diego and post Famosa Slough to the San Diego River Estuary. The river discharges into the Pacific Ocean just south of the jettied entrance of Mission Bay in the community of Ocean Beach. The majority of the runoff from the Project Area flows into the San Diego River. Alvarado Canyon Creek traverses the southern portion of the Project Area, and is a tributary to the San Diego River.

2.2.12 Population/Housing

There are no residential units located within the Project Area, although the Navajo and Tierrasunta Community Plan areas are comprised primarily of residential land uses. The redevelopment area encompasses primarily non-residential uses.

2.2.13 Public Services

Much of the infrastructure in the Redevelopment Project Area is deficient and in need of improvement.

Transportation and flood control infrastructure are the most notable deficiencies with respect to public services and utilities in the Project Area.

SISTALS MEAN TO BE PRATEA SPECIFIC AS STATED ES-19 HO1.

2.2.14 Mineral Resources

A 200-acre portion of a sand and gravet processing facility is located within Subarea B in the northern partion of the Project Area. The facility operates on both sides of the San Diego River and comprises a total of 250 acres.

2.3 Planning Context

As a basis for the redevelopment of the project, the project will be consistent with the City of San Diego Progress Guide and General Plan, community plans, and the Land Development Code (Zoning Ordinance) of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

Grant/ille Redevelopment Plon 2.4 December 13, 2004
Droft Program ER

RTC-55

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD5:

EIR page 2-4 states that there are existing public service deficiencies in the Project Area including, most notably transportation and flood control infrastructure. These deficiencies are discussed in further detail in Sections 4.2 Transportation/Circulation and 4.11 Water Quality/Hydrology of the EIR. Mitigation Measure HD 1 addresses the flood control deficiencies by requiring that, among others, an appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City engineering standards for the specific project.

The Draft Redevelopment Plan and Five-Year Implementation Plan also recognize the flooding issues in the Project Area and improvements to infrastructure, including flooding facilities, are incorporated into the redevelopment plan goals as well as the Five-Year Implementation Plan. Redevelopment plan goals addressing this issue include, "Improve public infrastructure and undertake other public improvements in, and of benefit to, the Project Area including: preparation of a comprehensive Public Facilities Financing Plan to address short and long term infrastructure improvements; storm drain improvements (particularly to properties affected by the Alvarado Creek and San Diego River) ... (Objective #3).



DD6

ter 3 – Project Description

- Inadequate lot size;
- Industrial pollution; and,
- Low lease rates.

The Agency proposes the Grantville Redevelopment Project as a catalyst to reverse the physical and economic blight in the area. Redevelopment would achieve the purposes of the CCRU Health and Safety Code Section 33000 et. seq.) by:

- Eliminating physical and economic blighting conditions;
- Replacement of obsolete and deteriorated public improvements and facilities; DOES CCRL INCLUDE
- Rehabilitation of industrial and commercial structures;

Planning, redesign, and development of areas which are underutilized;

Participation of owners and tenants in the revitalization of their properties;

- Providing affordable housing;
- Restoration of waterways and reduction of urban runoff along the San Diego River; and,
- Revitalization of commercial and industrial districts.

3.3.1 Redevelopment Project Actions

The Grantville Redevelopment Project will involve a number of subsequent actions over a 30-year time period to implement the Redevelopment Project. Redevelopment actions undertaken by private development interests and public agencies within the Redevelopment Project Area may include:

- Rehabilitating, altering, remodeling, improving, modernizing, clearing or reconstructing buildings, structures and improvements;
- b. Rehabilitating, preserving, developing, or constructing affordable housing in compliance with State
- Providing the opportunity for owners and tenants presently located in the Redevelopment Project Area to participate in redevelopment projects and programs, and extending preferences to occupants to remain or relocate within the Redevelopment Project Area;
- d Providing relocation assistance to displaced residential and nonresidential occupants, if necessary;
- Facilitating the development or redevelopment of land for purposes and uses consistent with the Redevelopment Plan;
- Providing incentives for property owners, tenants, businesses, and residents to participate in improving conditions throughout the Redevelopment Project Area:
- Acquiring real property by purchase, lease, gift, request, devise, or any other lawful means, after the conduct of appropriate hearings;

Grant-ille Redevelopment Project

December 13, 2004

TRAFFIC ISSUES RELATING

TO SAFETY?

Program Draft EIR

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD6:

No. Health and Safety Code Section 33030(c) provides that a blighted area may also include inadequate public improvements, parking facilities, or utilities. Health and Safety Codes Section 33445 allows the Agency to pay all or a portion of the costs associated with public infrastructure improvements that will benefit the Project Area and eliminate blighting conditions. However, improving safety in the Project Area is included as an objective of the Draft Redevelopment Plan (see Objective #2).

RTC-56

er 3 - Project Description

estments, providing incentives for private investments, and assembling properties suitable for new $\frac{1}{100}$ development at current standards. To fund the improvements needed to revitalize, rehabilitate, and attract private development to the Grantville Redevelopment Project Area, the Agency will utilize tax increment financing.

Redevelopment Project Objectives 3.4.1

Specific objectives for the Grantville Redevelopment Project include:

- Eliminate and prevent the spread of blight and deterioration, and redevelop the proposed redevelopment Project Area in accordance with the City of San Diego Progress Guide and General Plan, applicable community plans, the Proposed Redevelopment Plan, and local codes and
- Enhance economic growth within the Redevelopment Project Area by continuing ongoing efforts to revitalize industrial and commercial areas;
- Improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility, and improve transportation facilities, which support the vitality, safety, and viability of the Redevelopment Project Area;
- Alleviate the shortage of parking while avoiding negative impacts on residential neighborhoods resulting from the oversupply of parking by implementing a coordinated and comprehensive plan for the proportional distribution and proper configuration of parking spaces and facilities;
- Expand employment opportunities within the Redevelopment Project Area by encouraging the development of manufacturing enterprises and improving accessibility of employment centers within

and outside the Redevelopment Project Area;

DD7

WHAT

Improve public infrastructure and undertake other public improvements in, and of benefit to, the Redevelopment Project Area, such as undergrounding electrical distribution lines and telephone lines along major streets, widening, reducing or otherwise modifying existing roadways or creating $^\prime$ udditional streets for proper pedestrian and/or vehicular circulation;

Expand recreational opportunities within the Project Area;

Create an attractive and pleasant environment within the Redevelopment Area.

Projects and Programs 3.4.2

Economic Development Programs 3.42.1

Economic development programs are needed to improve the Redevelopment Project Area's economic base. These programs would facilitate the revitalization of blighted properties by using redevelopment tools. Agency staff will pursue reuse, redevelopment, and revitalization of nonconforming, vacant, or underutilized properties through marketing of the area and encouragement of private sector investment. Potential projects include, but are not limited to:

Grantville Redevelopment Project Program Draft EIR

3-10

December 13, 2004

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD7:

Please refer to responses to comments DD2 and DD5. EIR page 3-10 identifies objectives of the proposed project. As a component of the Redevelopment Plan adoption process, the Grantville Redevelopment Advisory Committee (GRAC), has reviewed and refined these objectives (see Section 110, Project Objectives 2 and 3 of the Redevelopment Plan). The objectives specifically address improving traffic flow, and public infrastructure including storm drain improvements (particularly to properties affected by the Alvarado Creek and San Diego River).

Redevelopment Project Objective 6 identified in the EIR, "Improve public infrastructure ..." would address flooding deficiencies in the Project Area as well. The Redevelopment Agency recognizes the flooding deficiencies in the Project Area as a major public facility deficiency of the Project Area. Correcting the Alvarado Creek flood control deficiencies are among the priorities identified in the Draft Redevelopment Plan and have been included in the Five-Year Implementation Plan (see response to comment DF2).

4.0-Environmental Analysis

4.2 – Transportatio



4.2 Transportation/Circulation

The following summarizes the findings of the Grantville Redevelopment Traffic Impact Analysis (Katz, C & Associates, November, 2004). The traffic study technical report is provided in Volume II Appendix B of EIR.

4.2.1 Existing Conditions

4.2.1.1 Methodologies

The traffic analysis examines existing (Year 2004) and Horizon Year (Year 2030) timeframes. Street system operating conditions are typically described in terms of "level of service." Level of service is a report-cord scale used to indicate the quality of traffic flow on roadway segments and at intersections. The Level of service (LOS) ranges from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion). A more detailed description of LOS is provided in the traffic technical study (see Volume II, Appendix B of this EIR).

Roadway Segment Capacity Analysis. The City of San Diego has published daily traffic volume standards for roadways within its jurisdiction. To determine existing service levels on study area roadway segments, a comparison was made among the appropriate average daily traffic thresholds for level of service, the daily capacity of the study area roadway segments, and the existing and future volumes in the study area.

Intersection Capacity Analysis. The analysis of peak hour intersection performance was conducted using the Traffix analysis software program, which uses the "operational analysis" procedure for signalized intersections as defined in the Highway Capacity Manual (2000 HCM). This technique uses i,900 passenger cars per hour of green per lane (pophgpl) as the maximum saturation flow of a single lane at an intersection. This saturation flow rate is adjusted to account for lane width, on-street parking, conflicting pedestrian flow, traffic composition (i.e., percent of trucks) and shared lane movements (e.g., through and right-turn movements from the same lane). Level of service for signalized intersections is based on the average time (seconds) that vehicles entering an intersection are stopped or delayed.

The Highway Capacity Manual analysis method for evaluating unsignalized, minor street stop intersections is based on the average total delay for each impeded movement. As used here, total delay is defined as the total elapsed time from when a vehicle stops at the end of a queue until the vehicle departs from the stop line. This time includes the time required for the vehicle to travel from the last-in-queue position. The average total delay for any particular minor movement is a function of the service rate or capacity of the approach and the degree of saturation.

4.2.1.2 Existing Circulation Network

Streets and highways in the study area that could be impacted by the proposed project include Fairmount Avenue, Friars Road, Mission Gorge Road, and Waring Road.

DD8

WHAT ABOUT TWAIN!

Grantville Redevelopment Project Draft Program EfR 4.2-1

December 13, 2004

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD8:

The actual functional capacity of a roadway segment is based on the ability of arterial intersections to accommodate peak hour volumes. Efficient designs of intersections to achieve acceptable levels of service could result in higher capacities.

The key signalized intersections of Twain within the project study area were analyzed. These include the intersection of Mission Gorge Road/Twain Avenue (Intersection 10) and Waring Road/Twain Avenue (Intersection 26).



)-Enviroumental Analysis

4.2 - Transportation/Circulation

4.2.3 Impact

DD9

The proposed action is to redevelop areas within the Navojo Community Planning Area. Future redevelopment activities will be in occordance with the applicable development regulations at the time specific redevelopment activities are proposed (e.g., zoning ordinance). The inherent nature of redevelopment tends to readjust the intensity of land use in the study area. Therefore, existing land use intensities were summarized and then compared to the proposed land use intensities to estimate the change caused by the redevelopment. This net change was used to calculate the increase, or decrease, of traffic in the project area. Any change in current land intensity results in a change of traffic on the surrounding roadway network.

4.2.3.1 Project Trip Generation

Vehicular traffic generation characteristics for projects are estimated based on rates in the City of San Diego's Trip Generation Manual (dated September 1998). This manual provides standards and recommendations for the probable traffic generation of various land uses based upon local, regional and nation-wide studies of existing developments in comparable settings. Appendix C of the traffic technical study (see Volume II, Appendix B) contains excerpts from the trip generation manual used in this analysis. Table 4.2-4 summarizes anticipated trip generation based on existing community plan land use designation. As shown in Table 4.2-4, redevelopment activities according to the existing Community Plan would add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The project impacts are analyzed in the 2030 "Horizon Year" scenario.

4.2.3.2 Project Access

The broad nature of and diversity of land use throughout the redevelopment area necessitates that generalized access points will dictate access throughout the redevelopment area. Project redevelopment in the Grantville Redevelopment Area will take access on the primary, adjacent streets including Friars Road, Mission Gorge Road, Waring Road, Princess View Road, Twain Avenue, Jackson Drive, and Fairmount Avenue.

4.2.3.3 Parking

Adequate parking should be assured by the developers per the San Diego Municipal Code, which establishes parking requirement for development within the City of San Diego.

4.2.3.4 Project Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that project related traffic will likely affect. Trip distribution information can be estimated from observed traffic patterns, experience or through use of appropriate travel demand models. Trip distributions for this analysis are derived from both observed patterns and a SANDAG Series 10 Select Zone Analysis. For purposes of this analysis, the Select Zone Analysis was used in conjunction with observed patterns and then split into 18 groups defined by geographic area. A distribution was assumed for each area relative to location. Appendix D of the traffic technical study (see Volume II, Appendix B) shows both the location of the land use groups and the distributions used for each.

Grantville Redevelopment Project Draft Program EIR 4.2-8

December 13, 2004

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RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD9:

As stated in Section 3.0 of the EIR, the redevelopment plan horizon is approximately 20-30 years. The EIR states that future redevelopment activities will be in accordance with the applicable development regulations at the time specific redevelopment activities are proposed (e.g., zoning ordinance) (see EIR page 4.2-8). This would apply to any land use amendments as well, if proposed in the future.

B. City of San Diego

According to U.S. Census Bureau data, in 2000 the total number of housing units within the City of San Diego was 450,691. In 1990, the estimated number of housing units was 406,096. During the ten year period, 44,595 housing units were added to the City's housing stock. This represents an increase of approximately 11 percent in the total number of housing units. According to SANDAG, the current (2004) estimate of housing units is 469,154, which represents a four percent increase between 2000 and 2004.

C. Community Plan Areas

The Project Area includes both the Navajo and Tierrasanta Community Plan areas. Only a very small portion of the Project Area lies within the College Community Plan area. In 2000, 19,914 housing units were located in the Navajo Community Plan area and 10,635 housing units were located in the Tierrasanta Community Plan Area. According to SANDAG, the 2004 estimate for the number of housing units in the Navajo Community Plan area is 20,128 and the 2004 estimate for the number of housing units in the Tierrasanta Community Plan Area is 10,985. This represents a two percent increase between 2000 and 2004 in the Tierrasanta Community Plan area and a 4 percent increase between 2000 and 2004 in the Tierrasanta Community Plan area.

D. Redevelopment Project Area

There are no housing units located within the Project Area. However, housing units are located in the surrounding area of the Navajo and Tierrasanta Community Plan areas.

4.12.2 Impact Threshold

For the purposes of this EIR, a significant impact to population and housing will occur if the proposed redevelopment project will:

- Induce substantial growth or concentration of population;
- Displace large numbers of persons; or
- Create substantial demand for additional housing.

4.12.3 Impact

4.12.3.1 Population

The Redevelopment Plan does not propose to change any land use designation within the Project Area. Therefore, the project would not generate an increase in population beyond the increase that could occur if the parcels designated for multi-family residential uses were redeveloped from their existing park and notel uses to residential (a total of 48 single-family and 86-multi-family units could be constructed under this scenario). The project would not result in the displacement of a large number of persons. Therefore, the project would not result in a significant impact related to population within the County, City, Community Plan Areas, or Project Area and no mitigation measure is required.

Grantville Redevelopment Project Draft Program EIR

4.12-3

December 13, 2004

Chapter 4 - Environmental Impuct Analysis

4.12 - Population and Housing

4.12.3.2 Housing

The Redevelopment Plan does not propose additional housing in the Project Area. Redevelopment consistent with the Navajo Community Plan would allow for approximately 48 single-family and 86 multifomily residential units. This would only occur if the existing uses of these parcels (park, notel) are redeveloped with residential uses. Development of these planned housing units within the Project Area would be less than one percent of the existing number of housing units within the Navajo Community Plan Area. Therefore, implementation of the proposed Redevelopment Plan would not induce substantial housing growth or concentration of population.

As provided by CRL Section 33334.2(a), no less than 20 percent of all tax increment revenue allocated to the Agency will be used for the purpose of increasing, improving, or preserving the community/neighborhood's supply of low and moderate income housing outside of the Redevelopment Area. This provides the community/neighborhood resources to maintain the low and moderate housing stock and assists residents with homeownership. Therefore, implementation of the proposed Redevelopment Plan would not require the displacement of population or housing.

The City recognizes that some residential land speculators may view approval of the Redevelopment Plan as an opportunity to develop residential land uses within the Project Area, especially during favorable economic conditions. Should residential projects be proposed on land that is not currently planned or zoned for residential development, an amendment to the Navaja Community Plan and approval of a zone change would be required. Therefore, because the project does not involve any redesignation of land uses, implementation of the proposed Redevelopment Plan would not induce substantial housing growth or concentration of population.

4.12.4 Significance of Impact

No impact associated with population and housing is anticipated.

4.12.5 Mitigation Measures

No mitigation measure is proposed, as no significant population and housing impact has been identified.

4.12.6 Conclusion

No significant population and housing impact is anticipated.

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THIS IS IN CONFUL	T WITH	RONST	arienteo
Developement? (ALSO	SPE NEX	TPAGE)

Grantville Redevelopment Project Droft Program EIR

4.12-4

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RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD10:

The EIR analyzes the potential impacts associated with the existing, adopted community plan land use designations. The EIR also provides an analysis of alternatives to the proposed project (see Section 8.0 Project Alternatives) which includes an analysis of a Transit-Oriented Development Principles alternative. As identified in the EIR (see page 8-25), the population/housing impact of the TOD alternative would be greater than the proposed project as it would introduce housing and population into the Project Area that is currently not contemplated in the existing adopted Navajo Community Plan.

pter 5 - Analysis of Long Term Effects

TABLE 5-1
Projections for the County of San Diego and the City of San Diego

	Total Po	pulation:	Toral H	ousings	Total Em	ployment a
County of San Diego	442,919	682,791	152,947	236,869	140,269	211,236
City of San Diego	1,223,400	1,656,820	469,689	604,399	777,600	975,990

Source: SANDAG, 2003

5.1.1 Land Use

The Redevelopment Plan is consistent with the City of Son Diego General Plan Land Use Element (Navajo, Tierrasanta and College Area Community Plans) and no General Plan Amendment or Zone Change is proposed. The project is also consistent with the MSCP and Regional Water Quality Confrot Board Plans. Achievement of orderly growth is dependent upon development in the future occurring in a manner consistent with the City's General Plan and other applicable regional plans. Since the City has adopted these plans and will continue to implement them no significant cumulative land use impact is anticipated.

5.1.2 Transportation/Circulation

The proposed project traffic impacts and cumulative traffic impacts are evaluated in Section 4.2 Transportation/Circulation of this EIR. Currently, several roadway segments and intersections located within and adjacent to the Project Area are not operating within an acceptable Level of Service (LOS). This condition is attributable to local and regional cumulative traffic. As discussed in Section 4.2, horizon year (year 2030) traffic volumes are based on the SANDAG Series 10 future forecast model. In the year 2030, the following roadway segments are expected to operate at an unacceptable LOS (without the proposed project):

DD11

- Friars Road from I-15 northbound ramps to Kancho Mission Road (LOS F);
- Friars Road from Rancho Mission Road to Santo Road (LOS E);
- Fairmount Avenue from I-8 eastbound off-ramp to Camino Del Rio North (LOS F); and,
- Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS E).

Additionally, the following intersections are expected to operate at an unacceptable LOS (without the proposed project):

- Camino Del Rio/I-8 westbound off-ramp and Fairmount Avenue (LOS F);
- Friars Road and I-15 southbound ramps (LOS E);
- Twain Avenue and Mission Gorge Road (LOS E); and,
- Camino Del Rio/I-8 westbound off-ramp and Fairmount Avenue (LOS F).

As identified in Section 4.2 (see Table 4.2-6), the proposed project would contribute to a significant cumulative impact as additional traffic generated in the Project Area will significantly impact roadway

Grantville Redevelopment Project Draft Program EIR

5-2

December 13, 2004

RTC-62

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD11:

The SANDAG Series 10 future traffic forecast model does not include the extension of Alvarado to Fairmount Avenue. Please refer to response to comment DOT2. Additionally, the proposed Five-Year Implementation Plan also identifies the initiation, design, and construction of Mission Gorge Road traffic improvements, including the Interstate 8 interchange at Alvarado Road.

apter 8 – Atternatives

8.3.1.12 Population and Housing

No impact to population/housing has been identified for the proposed project because the redevelopment plan is consistent with the Navajo. Tierrasanta, and College Area Community Plans. Under this alternative, substantially more housing (approximately 3,010 dwelling units could be constructed) would occur, which would represent a substantial increase in population beyond the level currently contemplated in the Navajo Community Plan for the Project Area. This alternative would result in a greater impact to population/housing than the proposed project.

8.3.1.13 Public Services and Utilities

This alternative would result in a greater impact to public services and utilities than the proposed project as a result of the increase in housing and population that would occur in the Project Area. This increase would place a greater demand on public services, including police, fire, schools, and parkland. This alternative would generate approximately 976 additional students (as compared to 65 generated under the proposed project). Additionally, this alternative would place a demand on parkland that would not occur under the proposed project. Based on City General Plan recommended parks to population ratio (approximately 20 acres/1,000 people), this alternative would generate a demand for approximately 22 acres of population-based parkland.

8.3.1.14 Mineral Resources

DD12

Implementation of this ulternative would result in continued operation of the sand and gravel-processing tacility located within the Project Area until the resources are exhausted or marginal economic return ends production. The conditional use permit expires in 2033. This alternative would result in a similar mineral resources impact as the proposed project.

8.3.1.15 Conclusion – General Plan Opportunity Areas Map Concept

This alternative is environmentally similar to the proposed project. Redevelopment that occurs under this alternative would result in greater environmental impacts to transportation/circulation, oir quality, noise, population/housing, and public services. Impacts would be similar related to land use, cultural resources, biological resources, geology/soils, hazards/hazardous materials, paleontological resources, oesthelics, water quality, and mineral resources. This alternative would meet most of the basic objectives of the proposed project.

8.4 Transit-Oriented Development Principals

Alternative MY UNDER STANDING IS TURN

THIS CURS THE PRIMARY FOCUS FOR

8.4.1 Description of Alternative Repeubling ment.

This alternative considers the environmental impacts associated with redevelopment activities occurring over the 20 to 30 year redevelopment timeframe anticipating land uses that would be consistent with Transit Oriented Development principals. This afternative assumes that land use designations would allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station that will be located in the southern portion of the Project Area. This area generally encompasses

Grantville Redevelopment Project 8-22 December 13, 2004
Droft Program ER

RTC-63

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD12:

Comment noted. The objectives of the proposed project are listed on pages 3-9 through 3-10 of the EIR as well as Section 110 of the Draft Redevelopment Plan. Draft Redevelopment Plan project objectives include, "Explore opportunities in the Project Area for development of mixed residential and commercial uses particularly transitoriented residential development to take advantage of nearby multi-modal transit system." Implementation of TOD land uses would require a community plan amendment.

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RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD13:

Please refer to response to comment DD12.



January 31, 2005

Mr. Tracy Reed City Redevelopment Agency 600 B Street, 4th Floor, MS 904 San Diego, CA 92101

Dear Mr. Reed:

RM1

California Neon Products owns approximately 4.5 acres in Subarea A of the proposed redevelopment project. As owners we would like to believe the proposed redevelopment program will generally improve the area by mitigating traffic, improving drainage and providing a better mix of uses that are more compatible with a changing neighborhood. Unfortunately, this Program Environmental Impact Report does not adequately address the universe of changes being planned around us.

RM₂

The Grantville Redevelopment Plan is being taken forward without a corresponding Community Plan Amendment. Under normal circumstances, Redevelopment Plans are adopted to implement a community plan or the City's General Plan. The Navajo Community Plan was adopted in 1982 and is out of date. The EIR addresses the impacts associated with buildout of that plan. Proposed improvements to Mission Gorge Road correspond to 1982 Navajo Plan and have little relevancy to today's traffic problems. As is noted in the following section of the EIR, if the detailed improvements were implemented, they would not improve service levels above Level F. This is totally unacceptable. The City needs to look for real mitigation before adopting this plan.

RM3

As shown in Table 4.2-4, redevelopment activities according to the existing Community Plan would add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The project impacts are analyzed in the 2030 "Horizon Year" scenario.

The Navajo Community Plan also states that Mission Gorge Road be improved to a six-lane major street between Fairmount Avenue and Interstate 8. This improvement has not yet been completed and the roadway is classified as a 4-lane major street. Table 4.2-7 shows that the impact that widening this segment to 6-lanes would have on the Level of Service for the Community Plan scenario. The level of service on this segment would remain an LOS F with this improvement under the Community Plan; and therefore, the impact is considered significant and unavoidable.

RM4

We are particularly concerned about figure 8-1, General Plan Opportunities Area Map Alternative Land Uses. It shows our property with a different land use designation than the one in the 1982 Navajo Plan. Does this mean that all the properties in my

4530 Mission Gorge Place, San Diego, CA 92120 • (619) 283-2191 Fax: (619) 283-9503

RESPONSE TO COMMENT LETTER FROM RICHARD MCCARTER, DATED JANUARY 31, 2005

Response to Comment RM1:

Comment noted. Please refer to responses to comments RM2 through RM6.

Response to Comment RM2:

Comment noted. Pursuant to California Community Redevelopment Law, the redevelopment plan must be consistent with the General Plan (i.e., Community Plans). As noted on EIR page ES-2, it is proposed that uses be permitted in compliance with the City of San Diego Progress Guide and General Plan, Navajo, Tierrasanta and College Area Community Plans. Implementation of the proposed redevelopment project would not preclude future amendments or updates to the Navajo Community plan. In the event the Navajo Community plan is updated in the future, the redevelopment plan would be amended to maintain consistency as required by law.

Response to Comment RM3:

The EIR concludes that the traffic impacts would be significant and unavoidable based on buildout according to currently adopted Community Plan land use designations, and roadway improvements as identified in the Community Plan. Future land use changes may occur in the Project Area, and the traffic and circulation impacts would need to be evaluated as a part of the approval process for future land uses. Furthermore, while the EIR traffic analysis is conservative (i.e., worst-case), in that it assumes circulation improvements only to the level consistent with adopted Community Plans, additional improvements and opportunities may be identified that would improve circulation.

An objective of the Draft Redevelopment Plan is to, "Improve public infrastructure and undertake other public improvements in, and of benefit to, the Project Area including: preparation of a comprehensive Public Facilities Financing Plan to address short and long term infrastructure improvements; ... widening, reducing or otherwise modifying existing roadways or creating additional streets, ... for proper ... vehicular circulation ... (Objective #3).

Please also refer to response to comment DOT3.

Response to Comment RM4:

The EIR evaluates alternatives to the proposed project that have the potential to reduce or avoid the potentially significant impacts associated with the proposed project. Although the General Plan Opportunities Map is evaluated as an alternative to the proposed project, further implementation of this alternative would require a Community Plan Amendment or Update, and a rezone of the affected properties. No such change is proposed at this time.

RM4 (cont'd.)

neighborhood will be rezoned to allow for Multi-Family Residential and Commercial? The Program EIR does not adequately address the impact of such a rezoning. The land use impacts are not "similar to the proposed project", (P. 8.9, Sec. 8.3.1.2).

RM5

Similarly, under the Transit Oriented Development Principals Alternative, our property could be considered for TOD housing at 25 dwelling units per acre. Does including this alternative in some way allow for a future rezoning without community input?

Thank you for the opportunity to comment on this Draft Program EIR. We look forward to your response in the final document.

RM6

Sincerely.

Richard McCarte Vice President

RESPONSE TO COMMENT LETTER FROM RICHARD MCCARTER, DATED JANUARY 31, 2005 (cont.d)

Response to Comment RM4 (cont.d):

It is expected that similar to redevelopment of the Project Area according to existing adopted land uses, redevelopment of existing land uses according to the General Plan Opportunities Map alternative would also reduce the occurrence of existing land use incompatibilities within the Project Area.

Response to Comment RM5:

The evaluation of the TOD Alternative in the EIR does not allow for future rezoning of the property. Any future rezoning would be subject to a discretionary review process by the City, including further opportunities for public review and comment.

Response to Comment RM6:

Comment noted.

Caster Properties, Inc.

Memo

To: Terry Reed, City of San Diego, treed@sandiego.gov

From: Brian R. Caster

Date: 2/9/05

Re: Grantville Redevelopment EIR Comments

Dear Tracy,

I wanted to get this to you before the meeting with the city council, and I would like to talk to you about it if I could. Below are my comments and questions.

Questions.

BC₂

BC3

BC4

BC5

BC6

BC7

BC8

BC1	1.	In the EIR 5.1.12 can you say, "The redevelop agency will encourage high density housing	
DC I		around the transportation hub of the trolley and bus station?"	

- If we were to get the property rezoned around the trolley station from industrial to residential, would we be required to build 20% low income housing?
- 3. Where in the EIR did it talk about the redevelopment agency working on the flood control problem on Mission Gorge Place?
- 4. Page 3.13 in the EIR Transportation, I did not know that we were planning to use the redevelopment funds to pay for any of the trolley?
- 5. Caster would like to see the figure in the EIR 8-1 show their property to be designated as an atterative use as High Density Residential. Can you do that?
- Page 4.1-15 Goals-can you say that one of the goals is to increase density wherever it is appropriate?
- 7. Page 4.1-15 there are two paragrahs that repeat not sure if this is a typo?
- 8. In the EIR 3.4.2.1 Project Objectives. I would like to see housing put in here too.

4607 Mission Gorge Place San Diego, CA 92120 619-287-8873 Ext. 117 Fax 619-287-2493 brcaster@castergrp.com

RESPONSE TO COMMENT LETTER FROM BRIAN CASTER, DATED FEBRUARY 9, 2005

Response to Comment BC1:

The Redevelopment Plan must be consistent with the adopted community plan, which currently shows industrial and commercial land uses in this area.

Response to Comment BC2:

Redevelopment Law requires that 20% of the tax increment generated in the Project Area must be used to improve or expand low and moderate-income housing. These funds may be spent either within or outside of the Project Area. Redevelopment Law also requires that 15% of new dwelling units constructed in the Project Area must be restricted for use by very low, low and moderate income households. This requirement must be met for the Project Area as a whole, not by each new housing project that is constructed. Redevelopment Law also makes provision for meeting this requirement outside of the Project Area boundaries.

Response to Comment BC3:

Description of existing flooding problems and potential flooding impacts are provided in various sections of the EIR; however, Section 4.11- Water Quality/Hydrology, provides a detailed discussion related to this issue. Figure 4.11-2 depicts the extent of the 100-year and 500-year floodplains within the Project Area based on SANGIS data (Flood Rate Insurance Map). This information depicts that large portions of the Project Area are subject to, and/or at risk for flooding. Mitigation Measure HD 1 is proposed to addresses the flood control deficiencies by requiring that, among others, an appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City engineering standards for the specific project. Furthermore, flooding is addressed in specific objectives of the Draft Redevelopment Plan and the Five-Year Implementation Plan, as discussed in responses to comments DRS6, DD2, DD5, and DD7.

Response to Comment BC4:

EIR page 3-13 provides a discussion of the project's relation to existing community plans, and lists applicable goals and objectives of the Navajo Community Plan. As referenced by the commentor, Subsection 3.6.1.1 Transportation states, "Complete the extension of the Mission Valley Light Rail Transit Lane to serve the College Area community." This is an objective of the adopted Navajo Community Plan, and is not a stated goal of the redevelopment project.

RESPONSE TO COMMENT LETTER FROM BRIAN CASTER, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment BC5:

The EIR evaluates alternatives to the proposed project that have the potential to reduce or avoid the potentially significant impacts associated with the proposed project. Regardless of whether the subject property as referenced by the commentor is shown as an alternative use, a Community Plan Amendment, rezone, and subsequent environmental review would be required in order to implement residential uses at this location.

Response to Comment BC6:

The goals listed on EIR page 4.1-15 are contained in the City of San Diego Progress Guide and General Plan. As it related to the goals, guidelines and standards for redevelopment and reinvestment, the General Plan does not identify the specific goal to "increase density wherever it is appropriate." However, Objective #8 of the Draft Redevelopment Plan states, "Explore opportunities in the Project Area for development of mixed residential and commercial uses particularly transit-oriented residential development to take advantage of nearby multi-modal transit system."

Response to Comment BC7:

The two paragraphs, while duplicative, address two specific goals of the City of San Diego Progress Guide and General Plan.

Response to Comment BC8:

Please refer to response to comment BC6.

EL DORADO PROPERTIES

6136 Mission Gorge Road, Suite 230 San Diego, CA 92120 Phone: (619) 283-5557 Fax: (619) 283-0023

January 25, 2005

Mr. Tracy Reed Project Manager City of San Diego Community & Economic Development Redevelopment Agency 600 "B" Street, Fourth Floor (MS-904) San Diego, CA 92101-4506

Dear Mr. Reed:

- Attached are pages from the Environmental Impact Report (EIR) Draft, for the Grantville

 PRS1 Redevelopment Project Volume I. I have marked my comments on the attached pages for your review or comment.
- DRS2 In general, I am quite pleased with the content of the report. However, I do feel it is necessary to be candid with my past, present, and future visions for the Grantville Redevelopment Project.
- The report throughout refers to the existing problem with flooding, and the need for traffic mitigation at Fairmount Avenue, and Mission Gorge Road. It also points to the need for planning and re-planning.
- In the Executive Summary, on Page ES-1: The redevelopment also includes the activities described in Section 33021, of the CCRL; which comprises of the following: C) (C) 2): Re-Planning.
- DRS5 Figure ES-1: The Alvarado Creek drainage and the trolley station channel should be shown on this figure.
- The health and safety of our neighbors and us is at issue here. The same area referred to above is a flood zone. This is an even bigger health and safety concern that has increased in magnitude over the years
- On Page ES-2: The Draft refers to the possible amendment to the City of San Diego Progress
 Guide, City of San Diego General Plan, the Navajo Area Community Plans, and the Land
 Development Codes, in order to achieve the objectives of the Grantville Redevelopment Project.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005

Response to Comment DR\$1:

Comment noted. Please refer to responses to comments DS2 through DS29.

Response to Comment DRS2:

Comment noted.

Response to Comment DRS3:

Comment noted.

Response to Comment DR\$4:

Comment noted.

Response to Comment DR\$5:

EIR Figure ES-1 has been modified to depict the Alvarado Creek drainage and trolley station channel.

Response to Comment DRS6:

Comment noted. The EIR identifies flooding as an issue within the Project Area. As stated on EIR page 4.11-3, "Portions of the Project Area are subject to flooding as identified by the Federal Emergency Management Agency (FEMA) maps during rain events. This is attributable to the fact that portions of the Project Area are located within the floodplain, the growth within the San Diego River Watershed (SDRW) that has increased, and inadequate drainage/flooding infrastructure. As depicted on Figure 4.11-2, the southeastern portion of Subarea A is located within the 100-year floodplain of Alvarado Canyon Creek."

Please also refer to responses to comments BC3, DRS6, DD2, DD5, and DD7.

Response to Comment DR\$7:

Please refer to response to comment RM2.

- **DRS8**Question 1: Section 3.3.3: Does this say that the current FAR of two (2) in some areas may be reduced to .34-.40? The area needs higher density, not less.
- **DRS9** Section 3.4.1: Redevelopment Objective, 3. 6: To improve the flow of traffic, the roadway needs to be the priority project. The flooding issue also needs to be corrected.
- **DRS10** Question 2: Section 3.4.2.1: Economic Development Program: Precisely, how will the Agency pay for itself as it assists the Grantville Project Area?
- Question 3: Section 3.4.2.2: Low and Moderate Income Housing Program: Does student housing qualify as low and moderate-income housing?
- **DRS12** Section 3.7.2, Page 3.15: Suggests that a rezoning map is necessary.
- **DR\$13** Ouestion 4: Section 3.7.2: What zoning designation should a transit area have?
- DRS14 This Figure 4.1-1: Should show an area with land use: Mixed Use and Transit Oriented Development next to the trolley station.
- Section 4.2.6: The environmental impacts present in the area will not be completely mitigated by the Grantville Redevelopment Project. Some mitigation can be achieved if the roadways between Highway Eight and Fairmount Avenue, the extension to Alvarado Canyon Road and Mission Gorge Road North 500' are improved. See attached Exhibit B.
- DRS16 Section 4.6-1: The Giant Reed (arundo donax), a very obnoxious plant, needs to be eradicated as a way to protect the native vegetation and those species of vegetation introduced by the planning process.
- Section 6.0: Growth Inducement: The upgrading of the area roadway system is the most important inducement to bring development into the area. This infrastructure upgrading is necessary, and should receive the first dollars acquired by the Agency.
- **DRS18** Question 4: Is the flood channel, also known as Alvarado Canyon Creek an infrastructure project?
- Question 5: What land use changes by amendment to the Navajo Plan, or City General Plan need to be made so that the project area would be consistent with Transit-Oriented Development?
- **DRS20** Figure 8-1 and 8.1: Mixed-Use, Transit-Oriented Development should be shown next to the trolley station.
- **DRS21** Section 8.4: The presence of the trolley station makes the area more suitable for Transit-Oriented Development.
- DRS22 Section 8.4.1: This section refers to a possible 2,500 multiple family units being built, whereas, Section 3.3.3, references a total of 48 residential units, and 86 multi-family dwelling units.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DR58:

As stated on EIR page 3-8, "It should be noted that existing land use regulations in the Project Area allow an FAR up to 2.0; however, the application of the .34 to .40 range is considered a more realistic estimate of future growth based on land use and infrastructure (e.g., roadway) capacities in the Project Area." Neither the EIR, nor the Redevelopment Plan propose to reduce the currently allowed FAR's within the Project Area.

Response to Comment DRS9:

Comment noted. Please also refer to responses to comments BC3, DRS6, DD2, DD5, and DD7.

Response to Comment DR\$10:

In compliance with Redevelopment Law, the Agency will adopt an Implementation Plan every five years that outlines the projects and programs to be implemented and how they will be funded. This will include necessary administrative costs. Additionally, each year the Agency will adopt an annual budget that outlines the specific costs and revenue sources that will be used to pay those costs, including administrative costs.

Response to Comment DRS11:

The determination of a "low and moderate-income" housing unit is made based upon annual household income, adjusted for family size, and the housing cost paid for that unit. A student may qualify if the legally mandated criteria are met.

Response to Comment DR\$12:

Comment noted.

Response to Comment DR\$13:

Transit areas, and transit-related uses, as well as land uses that may complement transit areas are allowed in various zones throughout the City. The City of San Diego Municipal Code also identifies transit overlay zones, would include special provisions for land uses within proximity to public transit systems (e.g., see Chapter 13, Article 2, Division 10).

Response to Comment DR\$14:

EIR Figure 4.1-1 depicts existing land uses in the Project Area based on land use surveys conducted as part of preparation of the EIR and accurately reflects existing land uses within the Project Area.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DNS15:

The segment of Fairmont Avenue between Interstate 8 and Mission Gorge Road is planned as a six-lane major street. The improvement recommended by the commentor would also improve traffic flow in this area. Future redevelopment would consider improvements such as suggested by the commentor and shown in the commentor's exhibit A. However, subsequent detailed engineering analysis would be required prior to implementation of the type of improvement suggested by the commentor. Establishment of a redevelopment project area would allow more opportunity for this to be addressed. Please also refer to response to comment DOT3.

Response to Comment DR\$16:

Comment noted. See also response to comment PRD11.

Response to Comment DR\$17:

Comment noted. Public infrastructure improvement priorities will be established in the 5-year implementation plan. The EIR analysis assumes implementation of only those traffic improvements as identified in the Navajo Community Plan. Please also refer to response to comment DD5 (public facilities financing plan) and DF4 (growth-inducing impacts).

Response to Comment DR\$18:

The future improvement to the Alvarado Creek flood channel is identified as a public infrastructure project in the Five-Year Implementation Plan.

Response to Comment DR\$19:

As discussed in EIR Section 8.4 Transit-Oriented Development Principles Alternative, land use designations would need to allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station. There are a variety of land use and zoning designations in the City's General Plan and Municipal Code that would allow residential and mixed-use developments, consistent with TOD principles. The subject areas are currently primarily designated for industrial and commercial uses.

Response to Comment DRS20:

Comment noted. EIR Figure 8-1 does depict mixed-uses in proximity to the trolley station.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DRS21:

Comment noted. Please also refer to responses to comments DR\$13, DR\$19, LM4, SNDG3, DD10, and DD12.

Response to Comment DR\$22:

Section 8.4.1, as referenced by the commentor, evaluates a land use alternative to the existing adopted Navajo Community Plan. Section 3.3.3 refers to the development potential according to the existing Navajo Community Plan land uses.

DR\$23 Question 6: Section 8.4.1: What is correct?

DRS24 Section 8.4.1.1: Encourages higher density residential use in proximity to the trolley station.

DR\$25 Question 6: What FAR would be acceptable in the Transit-Oriented Area?

DRS26 Question 7/8: Section 8.4.1: Does an FAR of two (2) equate to 25 units per acre? What section is more obtainable?

Section 8.4.1.15: Transit Oriented Development Principal Alternative: This is what the DR\$27 project is all about. Housing at the transit center promotes local retail business without the

aspects of automobile traffic.

A pocket park as open space and entryway into Grantville, and a roadway system change is important to obtain. See proposed area map attached as Exhibit A.

Thank you for your responses. Should you have any questions in reference to any of the above, please feel free to contact me at (619) 283-5557.

DRS29 Sincerely,

Daniel R. Smith

Member

Grantville Redevelopment Project Advisory Committee

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DR\$23:

Please refer to response to comment DS22.

Response to Comment DR\$24:

Comment noted.

Response to Comment DR\$25:

The acceptable FAR would be dependent on the specific type of mixed-use project proposed and land use configuration.

Response to Comment DR\$26:

An FAR of 2.0 does not necessarily equate to 25 units per acre. However, FAR (floor area ratio) does apply to both non-residential (e.g., commercial and industrial uses) and residential square footage. It is the allowed amount of building square footage based on the lot size. For example, on a one-acre parcel (43,000 square feet) with an FAR of 2.0, a maximum development of 86,000 square foot of building space would be allowed (not including any further restrictions related to parking requirements, landscaping and setbacks, etc.). Residential density is expressed in dwelling units per acre as well as FAR. A residential density of 25 units per acre would allow a maximum of 25 dwelling units on a one-acre parcel (not including any further restrictions related to parking requirements, landscaping and setbacks, etc.).

Response to Comment DR\$27:

Comment noted.

Response to Comment DRS28:

Comment noted.

Response to Comment DR\$29:

Comment noted.

Executive Summary

Project Description

The proposed project is the adoption and subsequent implementation of the Grantville Redevelopment Project, located in portions of the Navajo, lierrasanta, and Coilege Area Community Planning Areas of the City of San Diego. The primary discretionary action associated with the proposed project is the adoption of the Grantville Redevelopment Project Area by the Redevelopment Agency of the City of San Diego. The Redevelopment Agency proposes the establishment of the Grantville Redevelopment Project Area as a catalyst to reverse the physical and economic blight in the Project Area. A variety of redevelopment activities will be implemented subsequent to the adoption of the Redevelopment Project Area in order to achieve the objectives of the project. These activities will include, but not be limited to, the acquisition of land or building sites, improvement of land and building sites, rehabilitation of structures, improving public facilities and infrostructure, expanding employment opportunities, expanding recreational opportunities in the Project Area, and providing other public improvements and landscaping.

The Grantville Redevelopment Project will be implemented in accordance with the California Community Redevelopment Law (CCRL), Health and Safety Code Section 33000 et. seq. Approval of the project will implement a plan, with subsequent redevelopment, and private and public improvements within the Redevelopment Project Area encompassing approximately 970 acres of land.

Redevelopment is defined pursuant to Section 33020 of the CCRL as "the planning, development, replanning, redesign, clearance, reconstruction, or rehabilitation, or any combination of these, of all or part of a survey area, and the provision of those residential, commercial, industrial, public, or other structures or spaces as may be appropriate or necessary in the interest of the general welfare, including recreational and other facilities incidental or appurtenant to them." Redevelopment also includes the activities described in Section 33021 of the CCRL which comprise the following:

- Alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a Project Area;
- b) Provision of open space and public or private recreation areas; and,
- c) Replanning or redesign or development of undeveloped areas in which either of the following conditions exist:
 - the areas are stagnant or improperly utilized because of defective or inadequate street layout, faulty lot layout in relation to size, shape, accessibility or usefulness, or for other causes; or
 - the area requires replanning and land assembly for development in the interest of the general welfare because of widely scattered ownership, tax delinquency or other reasons.

As a basis for the redevelopment of the Project Area under consideration, it is proposed that uses be permitted in compliance with the City of San Diego Progress Guide and General Plan, Navajo, Tierrasanta and College Area Community Plans, and the Land Development Code (Zoning Ordinance) of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

Project Location

The proposed Grantville Redevelopment Project Area is located in San Diego County, in the eastern portion of the City of San Diego north of Interstate 8 and east of Interstate 15. A majority of the Project Area is located within the Navaja Community Planning Area, and generally includes the existing industrial and commercial areas along Friars Road, Mission Gorge Road, Fairmount Avenue and Waring Road. The approximately 970-acre Project Area consists of three non-conliguous subareas, referred to in this EIR as Subarea A, Subarea B and Subarea C. Figure ES-1 depicts the location of each subarea. The three subareas are described as follows:

Subarea A - Subarea A is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A comprises approximately 400 acres.

- Subarea 8 Subarea B consists of the commercial, office, industrial, sand and gravel, and open space uses located along Mission Gorge Road from Zion Avenue, northeast to Margerum Avenue. Within this subarea, sand and gravel processing operations take place on both sides of the San Diego River. The western boundary is defined by the residential neighborhood along Colina Dorada Drive. Subarea B comprises approximately 505 acres.
- Subarea C Subarea C includes a shopping center, retail uses and community facilities, at and
 adjacent to, the intersection of Zion Avenue and Waring Road. The Allied Gardens Community Park,
 and other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two
 churches are included as the community facilities in this subarea. Subarea C comprises
 approximately 65 acres.

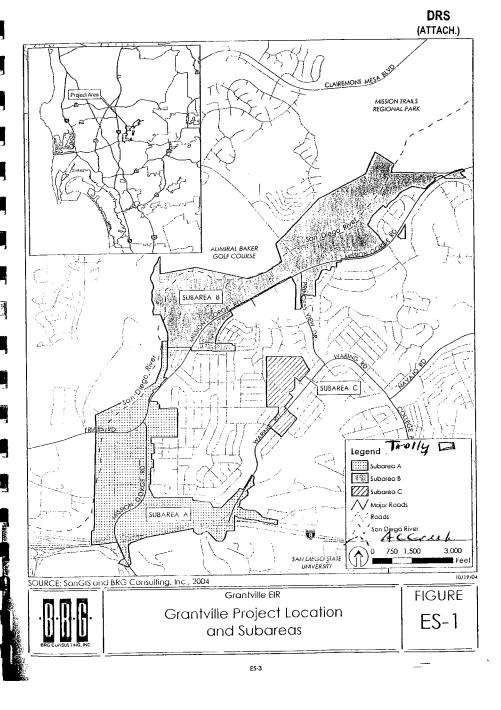
Environmental Impacts

The Redevelopment Agency determined that a Program EIR is required pursuant to the California Environmental Quality Act (CEQA). The environmental issue areas identified by the Agency and as a result of input received on the Notice of Preparation (NOP) and public scoping meeting for the project include the following: land use, transportation/circulation, air quality, noise, cultural resources, biological resources geology/soils, hazards and hazardous materials, pateontological resources, aesthetics, water quality/hydrology, population/housing, public services, mineral resources, cumulative impacts, grawth-inducing impacts, and significant irreversible environmental changes. Table ES-1 presents a summary of the environmental impacts of the proposed project, mitigation measures to reduce potential significant impacts for the proposed project, and the level of significance of each impact after implementation of proposed mitigation measures.

Grantville Redevelopment Project Draft Program EIR ES-2

December 13, 2004





Significant, Mitigable Impacts

Implementation of the proposed Redevelopment Project will result in significant impacts as a result of <u>future</u> redevelopment activities that will occur within the Project Area. Significant impacts have been identified to the following environmental issue areas:

- Air Quality (Short-term Construction)
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics

A Water Quality/Hydrology
A Frotfic Conges from
Public Services
A Confindral Flow Ding

Implementation of proposed Mitigation Measures identified in this Program EIR will reduce the impact to these resource areas to a level less than significant.

Significant, Unavoidable Impacts

Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)
- · Floodway

Implementation of proposed Miligation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

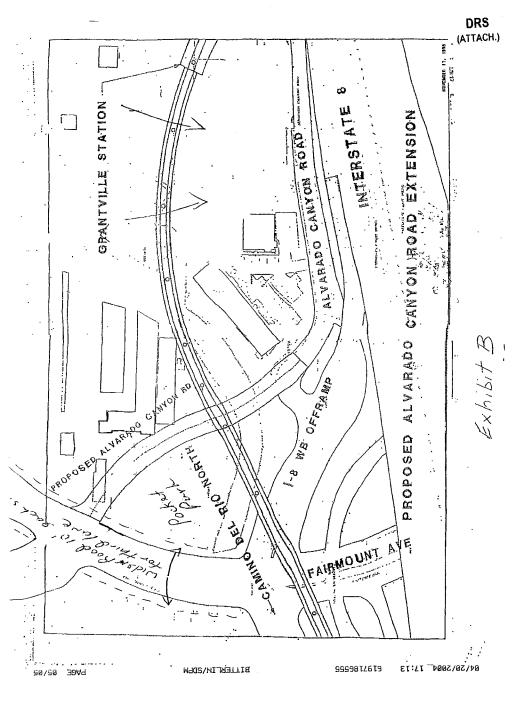
Grantville Redevelopment Project Draft Program EIR ---

December 13, 2004

TABLE S-1 Summary of Significant Impacts and Mitigation Measures

impact(s)	Recommended Mitigation Measure(s)	Significance of	
		Impact(s) After	
The state of the s	- 1	Mitigation	
Section 4.2 - Transportation/Circulation			****
Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,606	Inprovements identified within the Novajo and Tierrasanto Community Plans shall be implemented as sufficient financial resources became available through the	Significant and	
dally trips to the circulation network with 3,280 trips	establishment of the proposed redevelopment project area. These improvements	Unavoidable	
occurring in the morning peak hour and 4,346 trips	include:		
roadway segments would be significantly impacted:	 Widen Mission Gorge Road to c six-lane facility north of Zion Avenue with no left-turn lange except at glandized intersections. 		
Friars Road from I-15 North Bound Ramps to Rancho	 Widen Mission Gorge Road to a six-lane major street between Fairmount 		
Mission Road (LOS F);	Avenue and Interstate 8.		_
 Friors Road from Rancho Mission Road to Santo Road (LOS F)- 	Improve Mission Garge Road to a six-lane major street between Fairmount		
· Foirmount Avenue from I-8 East Bound Off Ramp to			
Camino Del Rio North (LOS F);		0	
 Mission Garge Road from Mission Garge Place to Twain 	1100 5/50 OF 11105100 OOLA	ノカット	
Avenue (LOS F);		•	
 Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F); and; 	9 × 8 1555 00 15 15 15 15 15 15 15 15 15 15 15 15 15	TILLY!	
Missian Gorge Road fram Friars Road to Zion Avenue (LOS E).		`	
The following intersections would be significantly impacted			
by the proposed redevelopment:			
 Friors & I-15 South Bound Ramps (PM Peak hour); 			
Frights & Missian Garge Road (PM Peak hour);			
Fairmount Avenue & Mission Garde Road (AM and PM			
Peak hours);			
· Camino Del Rio & I-8 West Bound Off Romp &			
Fairmount Avenue (AM and PM Peak hours); and, 1-8 East Bound On and Off Romms, 8 Engineering Avenue.			
(AM Peak hour).			
Ramp meter analysis was also conducted for the proposed			
following ramp meter locations: Frians Rd. to 1-15 North 14M			
Peak Hour); Friars Rd. to I-15 South (loop) (PM Peak Hour);			-
and, Friars Rd. (HOV) to I-15 North (PM Peak hour)			
			TAC

RTC-78



investments, providing incentives for private investments, and assembling properties suitable for new development at current standards. To fund the improvements needed to revitalize, rehabilitate, and attract private development to the Grantville Redevelopment Project Area, the Agency will utilize tax increment financing.

3.4.1 Redevelopment Project Objectives

Specific objectives for the Grantville Redevelopment Project include:

- Eliminate and prevent the spread of blight and deterioration, and redevelop the proposed redevelopment Project Area in accordance with the City of San Diego Progress Guide and General Plan, applicable community plans, the Proposed Redevelopment Plan, and local codes and ordinances;
- Enhance economic growth within the Redevelopment Project Area by continuing ongoing efforts to revitalize industrial and commercial areas;
- Improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility, and improve transportation facilities, which support the vitality, safety, and viability of the Redevelopment Project Area;
- 4. Alleviate the shortage of parking while avoiding negative impacts on residential neighborhoods resulting from the oversupply of parking by implementing a coordinated and comprehensive plan for the proportional distribution and proper configuration of parking spaces and facilities;
- Expand employment opportunities within the Redevelopment Project Area by encouraging the development of manufacturing enterprises and improving accessibility of employment centers within and outside the Redevelopment Project Area;
- 6. Improve public infrastructure and undertake other public improvements in, and of benefit to, the Redevelopment Project Area, such as undergrounding electrical distribution lines and telephone lines along major streets, widening, reducing or otherwise modifying existing roadways or creating additional streets for proper pedestrian and/or vehicular circulation;
- 7. Expand recreational opportunities within the Project Area;
- 8. Create an attractive and pleasant environment within the Redevelopment Area.
- 9. Flooring Problem

3.4.2 Projects and Programs

3.4.2.1 Economic Development Programs

Economic development programs are needed to improve the Redevelopment Project Area's economic base. These programs would facilitate the revitalization of blighted properties by using redevelopment tools. Agency staff will pursue reuse, redevelopment, and revitalization of nonconforming, vacant, or underutilized properties through marketing of the area and encouragement of private sector investment. Potential projects include, but are not limited to:

Graniville Redevelopment Project 3-10 December 13, 2004
Program Digit File

- Assist with rehabilitation of industrial and commercial buildings throughout the Redevelopment Project Area;
- Assist in the development of commercial nodes along Mission Gorge Road including mixed-use
- Assist in the development of additional parking opportunities throughout the Redevelopment Project Area:
- Assist in the development of light industrial and manufacturing parks; and
- Assist in assembling land for new development.

Economic development initiatives include implementation of an industrial and commercial rehabilitation program. This program would provide assistance in the form of grants and/or law interest loans to eligible Redevelopment Project Area businesses to encourage and assist in modernizing and improving industrial and commercial structures. The reinvestment in the business community would include façade improvements, rehabilitation of deteriorated buildings, hazardous materials disposal and signage upgrades.

Furthermore, the Agency proposes a proactive business expansion and retention program that would encourage new businesses to locate within the boundaries of the Redevelopment Project Area, and assist in the retention of existing businesses. This investment in the business community may include expanded marketing of the area, improvements to business facilities to meet modern market demands, and other actions to deter sales tax leakage. r sales tax leakage.

Low And Moderate Income Housing Programs

3.4.2.2

As provide by CRL Section 33334.2(a), no less than 20 percent of all tax increment revenue allocated to the Agency shall be used for the purpose of increasing, improving, or preserving the community's supply of low and moderate income housing. Taken together, these factors present a substantial challenge for the Agency, yet also provide an apportunity to influence the community by providing resources to maintain the low and moderate housing stock and to assist residents with homeownership. In order to meet these objectives, the Agency may develop new programs for property owners such as:

- First-Time Home Buyer Program Develop a training program for first time homebuyers to educate them about saving for, financing and caring for a home. Another facet of the program could offer "silent second" mortgages to homebuyers that are very low or low income according to HUD guidelines. Both the realty and backing communities would be key participants in this program.
- Rehab Loan Program for Single-Family Owner-Occupants This program would be offered to existing homeowners and provide grants, low-interest rate loans for property improvement or additions. This would assure residents live in safe and sanitary housing and alleviate overcrowded conditions by constructing additional bedrooms as needed.
- Multi-Family Rehabilitation Program Offer low interest rate loans to rehab units occupied predominantly by very low, low and moderate income residents. This would assure that owners are

Grantville Redevelopment Project Program Draft EIR

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December 13, 2004

3.6.1.4 San Diego River Revitalization

- Continue the ongoing process to complete the San Diego River Master Plan.
- Ensure that future development along the San Diego River is designed to minimize impacts to this

Alyorado Cruk 3.6.1.5

Economic Restructuring and Reinvestment Goals

- To enhance Grantville's commercial corridors as neighborhood and community oriented shopping and employment centers.
- To improve accessibility of employment centers within and outside the community.

Utilities 3.6.1.6

Undergrounding of electrical distribution lines and telephone lines along major streets is jointly financed by the City and San Diego Gas and Electric (SDG&E). Priorities for undergrounding are based upon the amount of traffic, congestion of wires, and major scenic routes. The plan recommends continuation of the undergrounding of overhead lines, and recommends that guidelines be established for the timely removal of utility poles once underground facilities are in place.

3.6.1.7 Parking

As a result of historical development patterns, changed demographics and current parking needs, the Grantville community faces problems with the quantity, location and safety of it's existing parking supply. Many of the older, predominately commercial and industrial areas were developed with parking standards that were appropriate for the early twentieth-century, but do not meet current demands. Furthermore, the existing parking supply of many projects is found to have inadequate configuration for its location and is unsuited to the needs of current businesses.

3.6.2 The Tierrasanta Community Plan

Approximately 130 acres of sand and gravel operations fall under the jurisdiction of the Tierrasanta Community Plan, which was adopted in 1982. The sand and gravel processing area is isolated from the Tierrasanta community at its southeastern corner and has been designated as open space by the Tierrasanta Community Plan.

3.6.2.1

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitiated and a pathway to Mission Traits be provided. Any other use of the property beyond open space uses will require an amendment to the plan.
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes.

Grantville Redevelopment Project

3-14

December 13, 2004

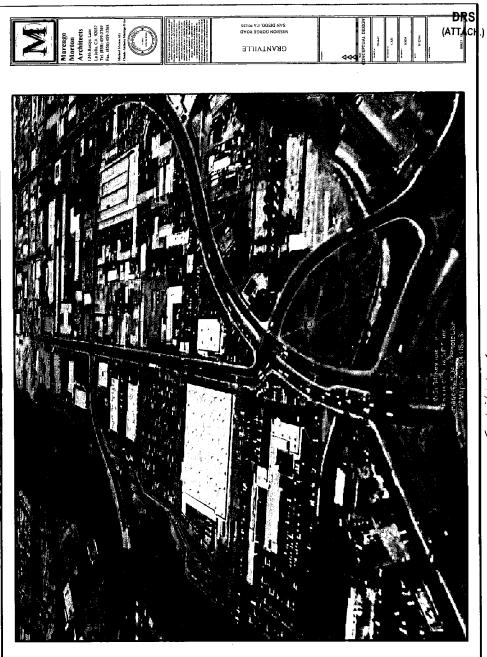
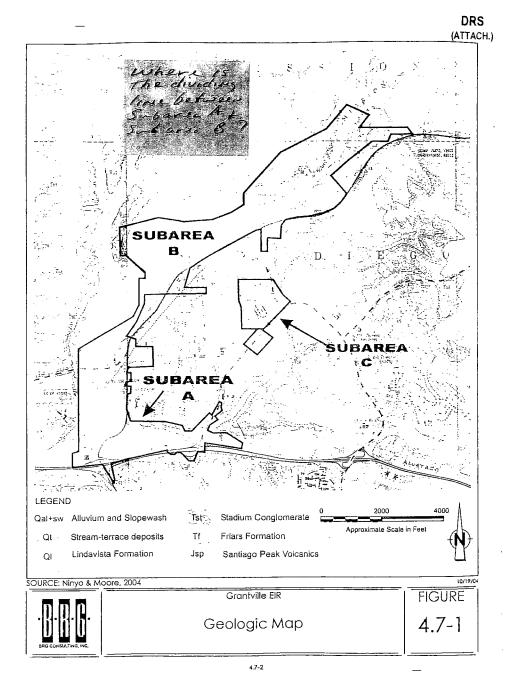


Exhibit A



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and a construct City of	F San Milao Rede	VALODMENT Contact Person:	Mr. Tracy Reed
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☐ Early Cons	(Prior SCH No.)		Other
☐ Neg Dec ☐ Draft EIR	Other	☐ FONSI	
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General Plan Update	Specific Plan	Rezone	Annexation
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General Plan Element Community Plan	☐ Planned Unit Developmen ☐ Site Plan	t Use Permit Land Division (Subdivis	
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DRS

Reviewing Agencies Checklist	Form A, continued	KEY
		S = Document sent by lead agency
Resources Agency		X = Document sent by SCH
Boating & Waterways		√ = Suggested distribution
Coastal Commission		
Coastal Conservancy		to the Atlanta Amandas
Colorado River Board		Protection Agency
Conservation	Air Resources Boa	
Fish & Game	California Waste N	_
Forestry & Fire Protection	SWRCB: Clean W	
Office of Historic Preservation	SWRCB: Delta Un	
Parks & Recreation	SWRCB: Water Q	
Reclamation BoardS.F. Bay Conservation & Development Commission	SWRCB: Water Ri	ignis
Water Resources (DWR)	Youth & Adult C	orrections
Business, Transportation & Housing	Corrections	
Aeronautics		mmissions & Offices
California Highway Patrol	Energy Commission	
	Native American I	
Department of Transportation Flamining (neactifulations)Housing & Community Development	Public Utilities Co	
	Santa Monica Mon	
Food & Agriculture	State Lands Comm	
Health & Welfare	Tahoe Regional P	sulting vicincy
Health Services	Other	
State & Consumer Services	Ould	
General Services		
OLA (Schools)		
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Address: 304 Tyy Street		
City/State/Zip: San Diego, CA 92101		
Contact: TIM GNIOUS AICP		
Phone: (619) 398-7127		
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Applicant:		
Address:		
City/State/Zip:		
Phone: ()	11	
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Page 1 of 2

Tracy Reed - Grantville Draft EIR

From:

"Charles Little" < lchuck@sprynet.com>

To:

CLA5

CLA6

CLA7

<treed@sandiego.gov>

Date: 1/24/2005 4:01:09 PM Subject: Grantville Draft EIR

Mr. Tracy Reed

Re: Draft Grantville Environmental Impact Report

As I read the EIR I see no way the redevelopment plan as envisioned would meet **CLA1** the stated goals for Grantville.

As outlined in the Draft Grantville Redevelopment plan.

Improve Public Infrastructure and undertake other public Improvements.

CLA2 Seems as though those are the responsibility of government to take care of from t tax dollars we pay on a yearly basis.

4 Improve the flow of traffic, relieve congestion.

The EIR as I read it indicates that the redevelopment will NOT accomplish this. As I look at the stated time it takes to go thru the traffic light at the intersection at Fairmount and Mission Gorge road.

I find those numbers unrealistic and they would not improve with the so called redevelopment.

6 Establishing a Business Improvement District and/or Maintenance Assessmer CLA4 District.

Does the above mean we get no services from our tax money???

We need a updated Grantville plan so the existing owners can meet the demands the community.

So far the additions to the Grantville area has increased traffic with no help to improve the traffic flow.

I speak of the Honda facility Sav-on and Home Depot.

I am not against upgrading our area, but we should do it without creating more of traffic nightmare.

Eminent should not be a tool of this plan.

CLA8 As you all know Eminent Domain was not to be used to take property owners property for the use of some third party.

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RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005

Response to Comment CLA1:

Comment noted. The EIR provides a conservative analysis with respect to traffic impacts, as only those improvements currently shown in the adopted Navajo Community plan are evaluated. This does not preclude the ability of the agency to implement currently undefined improvements within the Project Area in order to meet the goals of the redevelopment plan. Additional, specific traffic improvements will be identified as specific redevelopment projects are proposed and evaluated. See also responses to comments DOT3 and DRS17.

Response to Comment CLA2:

Comment noted.

Response to Comment CLA3:

Appropriate mitigation at each impacted location will be looked at on a project-by-project basis (see responses to comments DOT3 and DRS17). Individual development will be required to evaluate environmental impacts and implement appropriate mitigation where necessary. Fairmont Avenue (Mission Gorge Road) is planned as a six-lane major street.

In accordance with City of San Diego intersection capacity methodology, the delay reported for signalized intersections is average delay for all vehicles entering the intersection.

Response to Comment CLA4:

The Business Improvement District (BID) has been removed from the proposed Grantville Draft Redevelopment Plan.

Response to Comment CLA5:

Comment noted.

Response to Comment CLA6:

Recent developments, such as those referenced by the commentor and including the Honda facility, Sav-on and Home Depot are currently allowed by right within the Project Area. The adoption of a redevelopment project area would provide the ability to implement additional traffic improvements through tax increment.

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLA7:

Comment noted. It should be noted that the EIR evaluates future growth of the Project Area according to existing community plan land use designations.

Response to Comment CLA8:

The Grantville redevelopment plan as currently drafted proposes the inclusion of eminent domain authority (see Section 410 of the Redevelopment plan). Eminent domain continues to be the subject of public review and review by the GRAC. The GRAC has modified the language to require specific findings that would need to be made to use eminent domain in the Project Area. The City of San Diego will ultimately be the authority as to whether eminent domain authority will be included in the redevelopment project area.

CLA9 And to increase the tax base of the area.

Charles Little P.O. Box 600190 0190 San Diego, CA 92160-0190 lchuck@sprynet.com

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1/24/2005

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (conf.d)

Response to Comment CLA9:

See response to comment CL-A8.

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PAGE 01

Mr. Tracy Reed Redevelopment Agency 600 B Street, Fourth Floor, MS 904 San Diego, CA 92101-4506 February 1, 2005

SUBJECT: Personal Comments

Program Environmental Impact Report Draft

Grantville Redevelopment Project, Volume I, Dec. 13, 2004

San Diego, CA

Dear Mr. Reed:

Below we have itemized our concerns regarding the following items.

A. Executive Summary - Significant, Unavoidable Impacts

"Based upon the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources area:

1. Transportation/Circulation

2. Air Quality (Long-term Mobile Emissions)"

Please refer to Page 4.2-9, Table 4.2-4, regarding TRIP GENERATION for the proposed project. The proposed Redevelopment Project projects an increase of 31,606 Daily Trips. Please refer to Page 4.2-20 for Significance of Impact. There are six roadway segments, and there are six intersections that will be adversely impacted.

The above data certainly shows how this development will add to a existing very serious traffic problem in the Navajo Community Plan area.

The mitigation measures on Table S-1. Page ES-6, not only come up short in the view of those of us who travel these roads daily, the measures will only add to the existing travel gridlock along Mission Gorge Road and Fairmount Avenue. Please also note that there is no mention of mitagation measures for Fairmount Avenue. Problems exist today on Fairmount at the Traffic Light at Mission Gorge Road. This traffic problem is exacerbated by

CLB2

CLB1

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005

Response to Comment CLB1:

The commentor restates data and analysis as provided in the EIR. It should be noted that the trip generation estimate of 31,066 trips is estimated for the life of the project, which may occur over an approximate 25-30 year period. The EIR identifies that significant traffic conditions and deficiencies exist in the Project Area and are not likely to improve, even with the implementation of traffic improvements as currently identified in the adopted Navajo Community Plan. It is evident that additional improvements will be required in order to improve traffic in the area. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment CLB2:

Please refer to response to comment CL-B1. The commentor identifies other traffic deficiencies within the Project Area that could be addressed through redevelopment activities. For example, as referenced by the commentor, the traffic problem on Fairmount at the traffic light at Mission Gorge Road is exacerbated by loading and unloading of car transporters. Also, the design of the intersection does not meet the needs of current traffic. Circulation improvements, as those suggested by the commentor can be incorporated into redevelopment activities and should continue to be suggested to the Agency and City who will make decisions and prioritize improvements within the Project Area. Specific circulation improvements are identified in the proposed Five-Year Implementation Plan including Mission Gorge Road traffic improvements and Interstate 8 interchange at Alvarado Canyon Road.

82/84/2005 15:01 6195630610 PAGE 02

CLB2 (cont'd.)

CLB3

CLB4

the unloading and loading from Car Transporters. The design of this intersection does not meet the needs of current traffic.

The following is the amount of time it took the undersigned to travel southbound on Fairmount Ave., on to Mission Gorge Road, at 11:45am, February 4, 2005. Weather clear.

From a dead stop, waiting for 10 cars, and an undetermined number of light cycles, it took us three minutes and 31 seconds to arrive at the white line at the entry of the intersection. Additionally, it took us another one minute and 30 seconds stopped at the red light, before we could turn right and go south onto Mission Gorge Road through the green light. No right turns are permitted on a red light. The total elapsed time to make a right turn on to Mission Gorge Road was five minutes. The important thing to note that the above time trial was done at Off Peak Time.

Please refer to Page 4.2-3, Table 4.2-2, of the Program Environmental Impact Report, that states "Existing Peak Hour Intersection Conditions". Item No.11 (Fairmount Ave & Mission Gorge Road) only indicates a Average Intersection Delay at AM PEAK HOUR of 15.8 seconds. A Average Intersection Delay of 19.2 seconds is for PM PEAK HOUR.

We question the validity of the above times listed under "Existing Peak Hour Intersection Conditions"

Regarding Air Quality (Long Term Mobile Emissions), we ask you to refer to Page 4.3-11, Table 4.3-5. Four out five of listed pollutants exceeds significance Threshholds.

CLB5

Page 4.3-12, Table 4.3-6 Four out of five listed pollutants exceeds significance Threshholds.

Page 4.3-13, Table 4.3-7; Poorly Operating Intersections. Five out of the listed six intersections show a "Level of Service" of "F". One intersection is listed as "E".

CLB6

Quoting from 4.3.3.4, CO Hotspots "Vehicles idling at these intersections could create CO hot spots which may impact sensitive receptors in the vicinity of the intersections."

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLB3:

Comment noted. This information confirms what is already stated in the EIR, that traffic and circulation impacts are, and will continue to remain significant even with the implementation of improvements as currently identified in the adopted Navajo Community Plan. Please also refer to response to comment CLA3.

Response to Comment CLB4:

Please refer to response to comment CLA4.

Response to Comment CLB5:

Comment noted.

Response to Comment CLB6:

02/04/2005 15:01 6195630610 PAGE U3

Our final concern regarding the approval of this project is summarized on Page ES-4:

CLB7

"If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a STATEMENT OF OVERIDING CONSIDERATIONS pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines."

Because of aforementioned concerns, we feel that the proposed project should not go forward.

CLB8

Respectfully submitted,

Charles Little PO Box 6000190 San Diego, CA 92160-0190 (lchuck@sprynet.com)

Alfred Venton 637l Murray Park Court San Diego, CA 92119-2930 (email venton@cox.net)

- (1) addressee by fax
- (1) Councilman Jim Madaffer

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLB7:

Comment noted. Pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve a project." In so doing, the City must adopt a statement of overriding considerations for the proposed redevelopment project as significant unavoidable impacts to traffic/circulation and air quality have been identified.

Response to Comment CLB8:

February 8, 2006

Tracy Reed Redevelopment Agency 600 B Street, Suite 400 San Diego, CA 92101

RE: Grantville Redevelopment Project Draft EIR

Mr. Reed,

The following are some of my comments and/or concerns regarding the Draft EIR pertaining to the Proposed Grantville Redevelopment Project.

TRAFFIC

LM1

LM2

LM3

Traffic is the major concern of the GRAC, business owners in the proposed area and residents in the surrounding area. The EIR indicates that traffic will increase, mitigation measures will be taken and the impact after traffic mitigation will still be significant and unavoidable. If the EIR projections on traffic increases are correct, and many believe the numbers will be worse because ultimately the City will use this project to increase residential density, this proposed redevelopment area creates a even bigger traffic problem than the area has currently. All you have to do is take a look at the traffic problems in Mission Valley where major development (both commercial and residential) has been permitted to see what will happen to Grantville. Why would the City Council go forward with a project that does not solve (or at least improve) the major problem in the area? If the project does go forward what assurances do those inside the project area and those surrounding it have that traffic mitigation measures will be the first project undertaken?

I would also like to see a more detailed plan on how increased transportation/circulation within the project area will impact the areas outside of the project area. If the problems with the I8 interchange at the Fairmount/Mission Gorge area are not resolved, many cars will be looking for alternative routes through residential areas. You stated in a recent GRAC meeting that the anticipated cost of work at I8 would be extremely costly. When will it be known if this work will be done?

CHAPTER 8 – ALTERNATIVES

Section 8.3 describes the "General Plan Opportunity Areas Map Concept" that basically says the alternative would implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages). The plan would increase commercial, industrial, single and multi-family residential units and reduce institutional, religious, hospital development and commercial recreation areas. The conclusion is that this is environmentally similar to and would meet most of the basic objectives of the proposed project. About two years ago the Allied Gardens Community made it very clear to our elected representative that they did not want the "City of Villages" concept in their neighborhood. Why would this now be included as an alternative?

1

RESPONSE TO COMMENT LETTER FROM LYNN MURRAY, DATED FEBRUARY 8, 2005

Response to Comment LM1:

Please refer to responses to comments DOT3, DRS17, and CLB2.

Response to Comment LM2:

The traffic analysis does include an analysis of roadway segments and intersections outside of the project area, and in same cases intersections were included in the Project Area so as to allow the City more ability to correct existing deficiencies. A specific example is the inclusion of the I-8/Fairmount/Mission Gorge interchange in the redevelopment project area. It is currently not known when interchange improvements will be initiated for this interchange; however, it is a well recognized, and documented traffic deficiency. The EIR traffic analysis further documents this existing deficiency and anticipates the deficiency will continue to exceed acceptable LOS standards in the future. No specific improvements were assumed in the traffic analysis as the currently adopted Navajo Community Plan does not identify improvements to this area, and any future improvements will require Caltrans involvement and further analysis and documentation pursuant to CEQA and the National Environmental Policy Act. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment LM3:

The EIR does not conclude that the General Plan Opportunity Areas Alternative is similar to the proposed project. In fact, the EIR states that the General Plan Opportunity Areas Alternative is NOT environmentally superior to the proposed project and identifies greater impacts to transportation/circulation, air quality, noise, population/housing, and public services that would result with this alternative than would occur under the proposed project (existing community plan land uses).

This alternative was originally included in the EIR analysis as one of several alternatives evaluated in the EIR that would have the potential to reduce one, or any combination of several environmental impacts associated with the proposed project. However, further evaluation of the alternative as part of the EIR process found the contrary. Additionally, this alternative was including in the alternatives evaluation as it generally represents recently adopted City policy as conceptualized in the General Plan Opportunity Areas Map, which is an adopted component of the City's General Plan. Any further consideration of this conceptual land use pattern by the City would require a community plan update and would undergo its own environmental review process in accordance with CEQA.

Section 8.4 describes the "Transit-Oriented Development Principals Alternative" that is considered environmentally superior to the proposed project and meets most of the basic objectives of the proposed project. This alternative would add 2500 dwelling units in the proposed area. We keep being told that the proposed redevelopment is not an attempt to put in more housing yet this alternative is specifically for that purpose. Again, it seems to be the "City of Villages" concept that the community has indicated they do not want. Were these alternatives chosen by the outside consultants who prepared this report or were they based on input from City staff?

APPENDIX A

Letter submitted by Jeryl W. Cordell, CDR, USN (Ret.) includes a 1999 letter pertaining to development at Admiral Baker Field. While this area is not in the current proposed redevelopment area, it cites various problems that relate to the whole Mission Gorge Valley. Flooding, hazardous material, noise, traffic, air quality and the resulting cumulative effects were some of the issues listed. These issues were cited as having significant impact; with recommended mitigation being that individual development projects submit appropriate studies and reports that shall be reviewed by the Agency and the City. Significance of Impact after mitigation was considered less than significant. I don't understand how issues as serious as some of these appear can be evaluated and considered less than significant when you do not even know at this point what "projects" will be proposed for the area. How can you evaluate cumulative effects if each project will be reviewed on an individual basis?

An additional letter from the United State Marine Corps expressed concerns that the project area will be affected by military operation of aircraft from Miramar. How would potential occupants of this area be notified of this situation?

Thank you,

LM7

LM6

LM4

LM5

Lynn Murray 6549 Carthage Street San Diego, CA 92120

2

RESPONSE TO COMMENT LETTER FROM LYNN MURRAY, DATED FEBRUARY 8, 2005 (cont.d)

Response to Comment LM4:

The primary objective in evaluating alternatives in the EIR is to find alternatives to the proposed project (in the case the existing adopted community plan) that have the potential to reduce the potentially significant impacts associated with the proposed project. Because transportation/circulation and air quality impacts were found to be significant an unavoidable, the TOD alternative was evaluated. TOD concepts are widely recognized and accepted by planning agencies, including the City of San Diego, SANDAG (refer to responses to comments SNDG1-4), and the San Diego Air Pollution Control District, as well as numerous national planning organizations as a mechanism to improve quality of life, livable communities, reduce local and regional traffic and benefit air quality as they encourage livable, walkable, community concepts, and emphasize the use of public transit systems, such as the Grantville trolley station located in the Project Area.

Response to Comment LM5:

The Program EIR, in fact, provides an evaluation of cumulative impacts as it analyzes the whole of the project based on the development potential according to existing adopted community plan designations. The Program EIR includes, among other environmental topics, a comprehensive evaluation of potential traffic and air quality impacts in the Project Area, in which case no feasible mitigation measures have been identified at this time that would reduce the impacts to a level less than significant (i.e., below significance thresholds). With respect to the remaining issues identified by the commentor, specific mitigation measures have been identified in the EIR that will ensure that the impacts to these environmental issue areas would be reduced to a level less than significant.

Additionally, individual projects will also need to be evaluated pursuant to the provisions of CEQA, which includes the consideration of cumulative effects. By disclosing these cumulative impacts at this level of analysis, the Agency understands that traffic improvements are needed to be conducted on a comprehensive basis, and can begin to prioritize improvements within the Project Area based on this information.

Response to Comment LM6:

With the exception of two areas, the majority of the Project Area does not allow residential uses. Any future development proposal within the Project Area that includes residential uses would require a community plan amendment, and notification disclosure as required by law.

Response to Comment LM7:

February 2, 2005

Tracy Reed Redevelopment Agency 600 B Street, Suite 400, MS904 San Diego, CA 92101

Re: Grantville Redevelopment

Dear Mr. Reed,

The following are some of the concerns I have regarding the proposed redevelopment for the Grantville/Allied Gardens area. I understand my concerns will be incorporated and answered in your proposal process. If this is not correct, please let me know and advise me on the proper channels to have my issues addressed.

JN1

JN2

JN3

JN4

JN5

JN6

JN7

3NL

JN9

JN10

JN11

JN12

JN13

- Our beautiful City is in a mess (i.e. pension fund, zoning enforcements, traffic lights not timed correctly, pot holes, etc., etc..); shouldn't we hold off taking on more of a financial burden until some of our current issues are resolved?
- 2. What assurance do we have that City employees can handle this job competently?
- 3. According to Donna Frye, the information regarding police and fire protection may be inaccurate in the proposal. Who is verifying the data?
- 4. Who is behind the push for this project? Fenton?
- 5. Will the air quality be impacted by the proposal? To what specific degree?
- 6. How much, specifically, will traffic be increased?
- 7. How will increased traffic impact crime in this area?
- 8. Have the owners of the small businesses in the impacted area been notified in writing? I understand perhaps the owners of the property may have been notified but the renters who own the businesses have not. This is there livelihood!
- 9. Why are property owners, i.e. Albertson's Shopping Center, not being held responsible for the upkeep of the property rather than the City?
- 10. Has this area been neglected so that it will become "blight"?
- 11. Why haven't zoning laws been enforced in this area?
- 12. I understand if this proposal is approved, funds will be diverted from schools. Is this correct?
- 13. I live on Carthage Street, what is the specific impact to my home?

As well as including my questions in the proposal I would appreciate a reply to my letter.

Thank you.

JN14

Jennifer Nickles 6591 Carthage Street San Diego, CA 92120

RESPONSE TO COMMENT LETTER FROM JENNIFER NICKLES, DATED FEBRUARY 2, 2005

Response to Comment JN1:

The implementation of the Grantville Redevelopment Project Area would increase revenues that could be expended on improvements within, and benefiting the Project Area.

Response to Comment JN2:

Comment noted.

Response to Comment JN3:

Please refer to response to comment DF1.

Response to Comment JN4:

The City of Planning Commission initiated the Grantville Redevelopment Adoption process by adoption of Resolution No. 3550-PC on August 5, 2004.

Response to Comment JN5:

Please refer to Section 4.3 Air Quality of the Program EIR for a detailed discussion of potential air quality impacts associated with the proposed project.

Response to Comment JN6:

Please refer to Section 4.2 Transportation/Circulation for a detailed discussion of potential traffic/circulation impacts associated with the proposed project. Development of the Project Area, according to the existing adopted community plan designations, is estimated to generate a net increase of approximately 31,606 vehicular trips over the implementation of the project (an approximately 25-30 year timeframe).

Response to Comment JN7:

The increase in traffic does not necessarily correspond to increases in crime. The Project Area currently experiences higher crime rate percentages than occur in other portions of the community.

- The Project Area generally has 37% higher crime rates per one thousand population than San Diego County.
- The Project Area generally has 16% higher crime rates per one thousand population than City of San Diego.
- There is a significant homeless population in the Project Area. 162 people were arrested along the San Diego River during a 4-week sweep period in the summer of 2004.

RESPONSE TO COMMENT LETTER FROM JENNIFER NICKLES, DATED FEBRUARY 2, 2005 (cont.d)

Response to Comment JN8:

In addition to the CEQA and Redevelopment Plan adoption process noticing requirements, the Grantville Redevelopment newsletter was mailed to over 1.500 property and business owners and interested members of the public in August 2004. The Grantville internet website has been active since January 2004 and has had a minimum of 100 visitors per month since it has been available.

Response to Comment JN9:

Neighborhood Compliance addresses code violations. Please refer to response to comment JN11.

Response to Comment JN10:

Blighting conditions are caused by a variety of factors, including lack of incentive by property and business owners to invest in improvements and enhancements to the physical conditions of the properties.

Response to Comment JN11:

Many of the properties within the Project Area are considered non-conforming uses and/or were constructed prior to current zoning controls and development standards were in place. Because there is little investment incentive in the Project Area at this time, these properties can not legally be brought into conforming with current zoning standards until that time the property is sold and/or converted to another use.

Response to Comment JN12:

Please refer to response to comment HS18.

Response to Comment JN13:

Existing residential uses are not included within the Redevelopment Project Area.

Response to Comment JN14:

Sent by: City of S.D. Commun Econ Dev 619 533 5270;

Holly Simonette 4838 Elsa Road San Diego, CA 92120-4211 (619) 501-7414

February 14, 2005

Mr. Tracy Reed Project Manager Grantville Redevelopment Project Economic Development Division 600 B Street, Fourth Floor (MS-904) San Diego, CA 92101-4506

RE: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

Dear Mr. Reed:

HSA1

Following are my comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project. I have also included a written copy of my comments at the Noticed Public Hearing of the Redevelopment Agency, Community and Economic Development on January 25, 2005.

Section 2.2.12 - Population/Housing: While it is true that the proposed Redevelopment Project Area encompasses primarily non-residential uses, recent statements by Tony Fulton, Executive Director of Development for San Diego State University suggest that he has already been involved in conversations with developers regarding putting student housing in the Grantville area. A recent article by Steve Laub, President of the College Area Community Council, also suggests that high-density residential uses are proposed in the Project Area:

HSA2

The City Redevelopment Agency is starting the process of a Grantville redevelopment project. Good news for them, but maybe better news for us because Grantville has the positive distinction of being one trolley stop away from the heart of SDSU. The large number of students driving to and from SDSU causes a lot of congestion on our arterials.... Grantville redevelopment offers the opportunity for much more housing virtually on the doorstep of SDSU. An affordable housing component next to the trolley theere [sic] would allow students to roll out of bed and onto a train that drops them off in the heart of Aztecland. Our Mayor and Council are advocates of smart growth along major transit corridors.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14. 2005

Response to Comment HSA1:

Comment noted. Please refer to responses to comments HS-A2 through HS-A32.

Response to Comment HSA2:

Comment noted. The individual quoted in the newspaper is affiliated with San Diego State University and is not affiliated with the City of San Diego. No specific development proposal has been proposed, or has been applied for in the Project Area as referenced by the commentor. Should such project be considered in the future, a community plan amendment, rezone and other actions would be required, and would be subject to review in accordance with CEQA.

ชาย 533 5270:

Mr. Tracy Reed February 14, 2005 Page 2 Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HAB3

These statements are reminiscent of the City of Villages concept that the Grantville community successfully fought several years ago. Additionally, the 12-acre property at the corner of Mission Gorge and Twain is being proposed as a mixed-use residential-commercial area with more than 500 units. Please address specific projects that are currently in the planning stages, or outstanding permit requests, within for the Grantville area within the proposed Redevelopment Project Area. Please incorporate all of these projects into the findings for the Program Draft EIR.

HAB4

Section 2.2.13 - Public Services: Please address the needs for police and fire protection in the Grantville Redevelopment Project area with the additional traffic, residences, commercial, and industrial uses in the area. Please address how local public safety officials will be able to serve the area with the increased traffic as identified in Section 4.2.

HAB5

Section 3.4.2.1 - Economic Development Programs: It would seem that eminent domain proceedings against land owners and small businesses would be necessary in order for the Redevelopment Agency to "assist in assembling land for new development." Please address how eminent domain proceedings (as allowed under CCRL (Health and Safety Code Section 33000 et seq.) would be used by the Agency to successfully implement its plans. Additionally, please address alternatives to eminent domain proceedings that may be used in the area. Please explain why these alternatives could not be used to immediately address the conditions along the Mission Gorge corridor without declaring Grantville a Redevelopment Project Area.

HAB6

Section 3.6 - Relation to Existing Community Plans: Please address why many, if not all, of the proposals noted in the Draft EIR cannot be completed under the existing community plans, through programs such as declaring Grantville a Business Improvement District.

Section 3.6.2.1 - The Tierrasanta Community Plan notes that upon termination of the sand and gravel operations on Mission Gorge, the area should be rehabilitated. Reclamation in the southern region of the quarry is already taking place. Additionally, Councilmember Jim Madaffer noted in his January 21, 2005 Mission Times Courier column, "Straight From Jim," that "the long-term transformation is to change what is a rock quarry and light industrial area into a bio-tech and high-tech production area. Please investigate and address any and all permit applications, plans submitted to the City's Development Services agency for even numbered addresses from 7188 to 7500 Mission Gorge Road. Please incorporate these proposals into the Draft EIR for the Grantville Redevelopment Project. Please investigate and address the PID that Superior Ready Mix submitted, and subsequently put on hold, for its quarry property. Please investigate and address Councilmember Madaffer's comments regarding the area and incorporate these long-term plans, including the impact on the region (including nearby residential areas) into the Draft EIR.

HAB7

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA3:

Currently, no formal application has been submitted to the Agency or City of San Diego therefore the specific characteristics of any such project, if in fact proposed in the future, are not known at this time and could not be evaluated. Projects of the nature as referenced by the commentor would necessitate a community plan amendment. Because the Redevelopment Plan must be consistent with the community plan, the project was evaluated in the context of the currently adopted community plan land uses within the Project Area.

Response to Comment HSA4:

Please refer to response to comment DF1.

Response to Comment HSA5:

The Agency has no current plans for acquiring any property in the Project Area; however, the Redevelopment Plan gives the Agency the authority to acquire property, including the use of eminent domain if certain criteria area met. The Agency will adopt Owner Participation Rules (currently under review by the Grantville Redevelopment Advisory Committee) that provide preferences to existing property owners and businesses to participate in the redevelopment implementation process. The private marketplace has and will continue to have the option of consolidating properties for new development without participation by the Agency. Such private market activity is preferred and will be encouraged. However, private enterprise has not been successful in the past in redeveloping the entire Project Area and it is for this reason that the tools of redevelopment are being sought.

Response to Comment HSA6:

Specifically, existing business owners in the Project Area have not shown an interest in forming a Business Improvement District (BID). The formation of a BID involves a "self-tax" on participating businesses, the funds of which would be used for improvement programs. Reference to the BID has been specifically removed from the Draft Redevelopment Plan; however, adoption of the redevelopment plan would also not preclude the formation of a BID by businesses in the Project Area in the future.

CDBG funds can be used to set-up the formation and analysis of a BID (if the area qualifies for CDBG funds); however, given the nature of certain regional improvements needed for the Project Area, the cost is likely excessive in terms of creating a successful BID that would significantly improve the Project Area.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA7:

Please refer to response to comment HSA3. The land use activities referenced by the commentor would require a community plan amendment, rezone and other related actions, including subsequent environmental review pursuant to CEQA. No application has been submitted regarding these projects and the details and characteristics are not known, therefore detailed environmental evaluation is not possible at this time.

Mr. Tracy Reed February 14, 2005 Page 3

Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HAB8

Section 3.7.1 - Redevelopment Agency of the City of San Diego: Recent news stories indicate that the City is unable (or unwilling) to issue bonds for redevelopment projects in other areas, most notably the NTC project. Please address how the Agency would undertake the "sale of tax increment bonds" for the Grantville Redevelopment Project. Additionally, please address how the Agency would acquire and dispose of property. and why it would be necessary to construct or rehab replacement housing (when no residential units are currently included in the Redevelopment Project area).

HAB9

Section 4.1.1.1.B - Land Use - Existing Conditions - Surrounding Land Uses - Please address how the projects proposed in the Redevelopment Project area, specifically increases in traffic congestion, air quality, and noise, would affect the surrounding land uses (i.e., residential communities next to or in-between Subareas A, B, and C.

HAB10

Section 4.1.3.1 - Development potential: This section notes that the primary goals of the Redevelopment Project include: improve the quality of life, eliminate physical and economic blighting conditions, and improve traffic flows. Please specifically address how this will be accomplished. Please address how it will be accomplished without "an amendment to the community plan land use designations," and how the Agency will accomplish these goals while being "consistent with the provisions of the community plan in which the activity is located."

Sections 4.1.4, 4.1.5, and 4.1.6 - Mitigation Measures and Conclusion: I don't understand how the Draft EIR can note that:

- · "No significant land use impact is anticipated.
- "No mitigation measure is proposed, as no significant land use impact has been
- "Implementation of the proposed project will not result in a significant land use impact."

These statements seem inconsistent with other areas of the Draft EIR and public statements made by Councilmember Madaffer, Tony Fulton, and Steve Laub. Please clarify and rectify.

HSA12

HSA11

Section 4.2 - Transportation/Circulation: SANDAG forecasts that in the year 2030, even without the proposed Redevelopment Project, these roads and intersections will continue to operate at an unacceptable Level of Service. The Redevelopment Project would add more than 31,000 cars along Mission Gorge and Friars Roads and other areas of the project. The draft EIR states that the Navajo and Tierrasanta Community Plans would help reduce the cumulative traffic impact when implemented. However, the "timing of these improvements is unknown, and the cumulative impact would remain significant and unavoidable."

HSA13

It appears from the Draft EIR that the widening of Mission Gorge Road to 6 lanes north of Zion Avenue and between Fairmount Avenue and Interstate 8 would create more of a bottleneck in these currently (and highly) congested areas. Additionally, these improvements are already part of the current Navajo and Tierrasanta Community Plans,

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA8:

The Agency may undertake the sale of bonds secured by tax increment at any time during the next 20 years. The sale will depend on the Agency's willingness to issue, and finding a willing underwriter for the bonds. The Agency would acquire property only after following the adopted procedures for seeking owner participation. Any property purchased by the Agency would be disposed of in accordance with law that may include negotiated sale subject to a public hearing. Replacement housing would only be required if, at some point in time, the Agency caused units of housing for low and moderate income persons to be destroyed. This is unlikely because there are no known housing units in the Project Area. However, given the 30-year life of the Redevelopment Plan, it is important to have this provision included in the Plan.

Response to Comment HSA9:

The EIR provides a detailed analysis of traffic, air quality, and noise, which includes areas both within the Project Area, and surrounding the Project Area. Please refer to Sections 4.2 Transportation/Circulation, 4.3 Air Quality, and 4.4 Noise of the EIR.

Response to Comment HSA10:

The Agency will adopt a Five Year Implementation Plan as part of the Redevelopment Plan adoption activities. This Implementation Plan identifies potential projects and programs to be undertaken. The draft of the Implementation Plan recognizes the potential for an amendment to the pertinent community plans. Land use within the Project Area will be controlled by the appropriate community plans as they exist or are amended in the future, therefore, the Agency's activities will be consistent with the provisions of the community plan in which the activity is located.

Response to Comment HSA11:

The conclusion with respect to land use that no significant land use impact anticipated is based on the fact that there are a variety of land use incompatibilities, conflicting land uses, and incompatible uses within the Project Area that do not comply with current City Municipal Code regulations. Any new development that occurs within the Project Area would be required to conform with current land use and zoning regulations including parking, setbacks, building heights, etc. Therefore no land use compatibility impact is anticipated.

Response to Comment H\$A12:

Mr. Tracy Reed February 14, 2005 Page 4 Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HSA13 (cont'd.)

and therefore it is not necessary to declare Grantville a Redevelopment Project area. Please address why these improvements could not be made by working with Caltrans and City Traffic Engineers at this time, and prior to the area being declared a Grantville Redevelopment Project area. Also, please address the costs associated with this realignment, with or without the Grantville Redevelopment Project.

HSA14

Additionally, please investigate and incorporate into the Draft EIR the current conditions along the East/West arteries between Mission Gorge and Waring Roads, most notably Zion and Twain, and the North/South major artery of Crawford Street. These roads are already heavily impacted by vehicular traffic trying to avoid congestion along Mission Gorge, Waring, and Friars Roads. Please investigate and incorporate the impact of this additional traffic on these same roads in the event that redevelopment in the area is pursued.

Section 4.3 – Air Quality: "Development forecasted for the region will generate increased emission levels from transportation and stationary sources." The analysis of long-term effects on the air quality concludes that "combined emissions from the Redevelopment Project Area and other developed areas in the Basin are expected to continue to exceed state and federal standards in the near term and emissions associated with these developments will exceed threshold levels."

HSA15

The Draft EIR notes that project-specific air quality analysis shall be prepared for future redevelopments to determine the emissions associated with construction activities and identify measures to reduce air emissions. It would seem that this project-specific analysis would open the door for poorer air quality in the Basin. For example, if 5 projects along Mission Gorge each added 150 vehicles and industrial-related emissions, the cumulative impact would be far greater (if analyzed comprehensively) than one project that added only 150. Please address the reason for project-specific analysis rather than comprehensive project analysis (as in other areas of the DEIR) for air quality.

HSA16

Section 4.10: Aesthetics notes that recommended mitigation includes "improve[ing] the appearance of the existing strip commercial development on Mission Gorge Road between Interstate 8 and Zion Avenue by reducing signs, improving landscaping and architectural design, providing consistent building setbacks and providing adequate offstreet parking." While I do not disagree that this strip of commercial development could use a face-lift, I am appalled at the idea of declaring the area a Redevelopment Project zone, when these same improvements could be made through implementation of a Business Improvement District or other programs for these business owners. Please address why this corridor has not been declared a Business Improvement District or received other programmatic assistance prior to the proposed declaration of it as a Redevelopment Project area.

HSA17

Section 4.12.3.1 – The first sentence of this section seems inconsistent with the plans noted earlier in this letter, as well as other areas of the Draft EIR: "The Redevelopment Plan does not

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA13:

The widening of Mission Gorge Road to 6 lanes north of Zion Avenue and between Fairmount Avenue and Interstate 8 are improvements identified in the currently adopted community plan. Please refer to responses to comments DOT3, DD5 and DR\$17.

The costs associated with these improvements are not known and would depending on numerous factors including engineering, environmental, and land use constraints.

Response to Comment HSA14:

Please refer to response to comment DD8.

The Program EIR evaluates community plan and general plan circulation element roadways, including intersections that serve the roadway segments identified by the commentor. As specific developments are proposed, each will be required to be analyzed for their potential localized traffic impact, including, residential streets.

Response to Comment HSA15:

The cumulative impact as a result of the development potential of the entire Project Area is quantified and disclosed. As stated on EIR page 4.3-13 that, "A project that is consistent with the applicable General Plan of the jurisdiction in which it is located has been anticipated within the regional air quality planning process (i.e., the RAQS Plan). Consistency with the RAQS Plan will ensure that the project does not have an adverse impact on regional air quality." Because the redevelopment plan must be consistent with the General Plan, the project is consistent with the RAQS. However, the EIR also analyzes the project as a whole based on project-specific significance thresholds (refer to EIR Table 4.3-4). As shown, the cumulative impact of development of the entire Project Area would exceed significance thresholds, and is considered significant. Therefore the impact of multiple projects are not slighted, and are in fact evaluated comprehensively. In recognizing this condition, Mitigation Measures AQ 1 and AQ 2 are proposed to ensure that each individual project is evaluated for compliance with appropriate air quality thresholds and measure are implemented to address air quality impacts. As specific developments are proposed, specific mitigation measures can be applied to each individual project based on the nature, size, and characteristics of the project. In accordance with CEQA, cumulative effects would need to be considered as part of the CEQA evaluation of each project.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment H\$A15 (cont.d):

Additionally, CEQA does not allow the piece-mealing of project analysis. Mitigation Measures have been identified in the EIR to ensure that, although a significant unavoidable impact has been identified, measures will be incorporated into future projects to ensure conformity to applicable air quality regulations.

Response to Comment HSA16:

Please refer to response to comment HS-A6.

Response to Comment HSA17:

Comment noted. Please refer to response to comment RM2.

Mr. Tracy Reed February 14, 2005 Page 5

Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HSA17

propose to change any land use designation with the Project Area." However, in order to accomplish many of the long-terms goals of the Redevelopment Project, including but not limited to the proposed high-tech/bio-tech industrial development at what is now the quarry, it would seem that significant changes would need to be made in the Community Plans. Public statements made at the Grantville Redevelopment Advisory Committee meeting on January 31. 2005 indicate that that is exactly what is planned - adopting the Environmental Impact Report and Grantville Redevelopment Project - then changing the Community Plans to be consistent with this new development. I hereby request that the Redevelopment Agency address these inconsistencies, and immediately stop any and all planning necessary to designate the Grantville Redevelopment Project area.

HSA18

Section 4.13.1 - Schools: Please address in the DEIR how the allocation of the tax increment to the Grantville Redevelopment Project area would affect local schools in the community and outside the Grantville community - i.e., with fewer tax dollars available to the San Diego Unified School District and San Diego Community College District taxing agencies.

HSA19

Section 4.13.4 - Sewer Facilities: The City cannot finance its current obligations to improve the wastewater and sewer pipes throughout the region. Please address how 60-year-old sewer pipes in the Grantville region will be able to handle an increase of approximately 26,160 gallons of sewer flows per day without any mitigation measures being proposed.

Section 4.13.5 - Police Services: As Councilmember Donna Frye noted during the Redevelopment Agency meeting on January 25, 2005, the existing conditions statement in this section is incorrect. I hereby request that ALL existing conditions statements throughout the entire Draft EIR be reviewed, investigated, corroborated, and, if necessary, changed for accuracy. Additionally, I request that any changes to the existing conditions that may result in changes to the Draft EIR be publicly noticed and additional time be given to review and make comments on these changes.

1SA20

Section 4.13.5.4 - Please address any and all potential impacts on Police Services related to response times in and around the Grantville Redevelopment Project area. These impacts should include analysis related to increased traffic congestion, increased population, and increased business entities in the area.

4SA21

Section 4.13.6.6 - Fire Protection: Please address any and all potential impacts on Fire Protection and Emergency Medical Services related to response times in and around the Grantville Redevelopment Project area. These impacts should include analysis related to increased traffic congestion, increased population, and increased business entities in the area, including but not limited to transport of patients to Kaiser Hospital Emergency Department and other facilities.

ISA22

4SA23

Additionally, Police & Fire Protection Services are paid for out of the City's General Fund. It is my understanding that the Grantville Redevelopment Project, as with other Redevelopment Projects throughout the City of San Diego, would divert property tax increment funds from the City's General Fund into infrastructure projects in the

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA16:

Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. In the case of school districts (K-14), a portion of the tax increment paid to the district is not deemed "property taxes" for the purposes of their financing pursuant to State law, and therefore, it is funding beyond what the school district would otherwise receive had there been no redevelopment project area. These new funds are available to be used for education facilities that benefit the Project Area.

Response to Comment HSA19:

The City requires upgrading sewer facilities and infrastructure commensurate with development. The improvement of sewer facilities can also be identified in the 5-year implementation plan for the Project Area.

Response to Comment HSA20:

Existing conditions and impact analysis information was researched and verified by the public service providers serving the Project Area. Please refer to DF1. The additional response provided in response to this issue and as responded to in DF1 does not meet the criteria for recirculation of the EIR as set forth in the CEQA Guidelines.

Response to Comment HSA21:

Please refer to response to comment DF1. Under the currently adopted Navajo Community Plan, no residential/population increase is anticipated within the Project Area (see response to comment PRD14).

Response to Comment HSA22:

Please refer to DF1.

Response to Comment HSA23:

Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. The City's General Fund will receive its portion of the first tier of these payments. It is probable that with redevelopment activities enhancing the area, the growth in assessed value will exceed what would have occurred absent the Redevelopment Plan so even though the City will receive only a portion of the tax increment, it could exceed what it would have received without adoption of the Redevelopment Plan. Additionally, new development caused by redevelopment activities will be planned to be "defensible space" built to current fire and safety codes that will improve the fire and public safety of buildings in the Project Area.

ev 619 533 5270:

Sent by: CITY OT S.D. Commun Econ Dev

Mr. Tracy Reed February 14, 2005 Page 6 Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HSA23 (cont'd.)

Grantville area. Please explain how Police and Fire Protection Services would be paid for once this diversion of General Funds is accomplished.

HSA24

Section 4.13.7.6 – Solid Waste: Please address any and all potential impacts on Solid Waste generated in the Project area. This should include anticipated closure of West Miramar Landfill in or around the year 2011.

HSA25

Section 4.14.1.2.B – Mineral Resources/Navajo Community Plan: I understand that owners of 7188 through 7500 Mission Gorge (which includes Superior Ready Mix), submitted (then withdrew) an application to the City's Development Services for a master planned industrial development (PID) permit. This submission seems consistent with Councilmember Madaffer's written statements regarding the bio-tech/high-tech industrial area in what is not the quarry. Please address the proposed PID for this area and what it includes. Please incorporate these proposals into the Draft EIR and address how the resulting impacts would be mitigated.

HSA26

Section 6.0 – Growth Inducement: Please provide me with appropriate documentation from the City's General Plan and Program Guide that includes the definition of "urbanization." It is my understanding that mining activities do not constitute urbanized activities.

HSA27

Section 8.1.1 – No Project/No Redevelopment Plan/Description of Alternative: It is noted that, even without the Project, "the Project Area would be developed pursuant to the existing community plan land use designations and zoning. The amount of development would be similar to the level estimated for the proposed project; however, the overall rate of development would be slower than under the Redevelopment Plan." Given that proposals within the Project Area would occur without designating the Grantville Redevelopment Project area, it would seem that the Agency has not met the conditions required for physical and economic blight, and is merely attempting to increase its portion of the property tax increment. I hereby request that the planning for and implementation of the Grantville Redevelopment Project be stopped immediately.

HSA28

Section 8.2.1.15 - Conclusion - No Additional Development Alternative: As noted, "[t]his alternative is environmentally superior to the proposed project. This alternative would reduce, or avoid, the project's impact to transportation/circulation, air quality, cultural resources, biological resources, and paleontological resources." The section also notes, "this alternative would not meet most of the basic objectives of the proposed project. It seems that, with the negative environmental impacts associated with this project, the No Additional Development Alternative would be preferable to the full implementation of the Redevelopment Project Area plan. Please address this recommendation.

HSA29

Section 8.3 – General Plan Opportunity Areas Map Concept – This plan would "generally implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages) Opportunity Areas Map for the Project Area." It appears that this alternative would generate a net increase of 50,359 daily trips, as opposed to 31,606 daily trips noted earlier in the Project Draft EIR. This alternative is unacceptable. The community has already kept the City from implementing the City of Villages in the Grantville area. Please

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA24:

The EIR provides an analysis of potential solid waste impacts (see pages 4.13-13 through 4.13-15). As discussed, the City of San Diego Environmental Services Department policy is to ensure that all requirements of a waste management plan are satisfied at the time of discretionary review, demolition, grading, or any other construction permit. Landfill capacities are discussed on pages 4.13-14 and 4.13-15 of the EIR.

Response to Comment HSA25:

An application for a Planned Industrial Development Permit for the subject property was submitted to the City approximately 5-6 years ago. There has been no action taken on the permit. The Grantville Redevelopment Plan EIR analyzes the potential impacts associated with implementation of land uses according to the existing adopted community plans. Sand and gravel and open space uses are assumed for the area referenced by the commentor in the proposed project scenario. Because no specific development is proposed for this area, it is not possible to evaluate the specific impacts and mitigation measures associated with any such project. Any future redevelopment of this area with an alternative use would require discretionary approvals including a community plan amendment and environmental review pursuant to CEQA.

Response to Comment HSA26:

The City of San Diego's General Plan and Progress Guide define "urbanized" areas within the City. The Redevelopment Project area, as well as surrounding areas are located within the City's designated urbanized area. The EIR assumes redevelopment of the Project Area according to existing adopted community plan designations. The sand and gravel area, although designated as Open Space with a sand and gravel subcategory, is within the urbanized area as set forth in the City's General Plan. Additionally, CEQA Guidelines Section 15387 defines an urbanized area as, "... a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile."

Response to Comment HSA27:

The Agency must adopt findings that show that the Project Area meets the criteria for blight as set forth in Section 33030 of California Community Redevelopment Law.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA28:

The comment is noted. The Redevelopment Agency will consider the alternatives evaluated in the EIR and will make findings regarding the adoption of the project and rejection of alternatives pursuant to CEQA Guidelines Section 15091.

Response to Comment HSA29:

Comment noted. Please refer to responses to comments RM4 and HSA28.

sent by: city of S.D. Commun Econ Dev 619 5

619 533 5270:

02/14/05 2:51PM; JetFax #977; Page B/12

Mr. Tracy Reed February 14, 2005 Page 7 Re: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

HSA29 (cont'd.)

HSA30

address why it is considered an alternative. Additionally, I request that this alternative be removed from the Draft EIR and not be considered as an alternative.

Section 8.4 – Transit-Oriented Development Principals Alternatives – This alternative "assumes that land use designations would allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station.... The area comprises approximately 100 acres of land. Under this alternative, it is assumed that existing non-residential uses would be replaced with residential uses and no additional non-residential development would occur with this area." It seems ridiculous to assume that this configuration would result in 7,200 fewer daily trips than the proposed project, as most residents in San Diego County do not use public transportation. Please address how this assumption was made and the data/information that was used to generate this result. As this alternative would result in substantially more housing, which would result in additional strain on public safety, utilities, sewer, traffic, and other services. I hereby request that this alternative not be considered and that the zoning not be changed to accommodate this alternative, nor any proposed residential development in this area.

HSA31

Additionally, please provide me the services and fees billed, paid, and/or budgeted for the production of the Grantville Redevelopment Project Draft Environmental Impact Report, Draft Preliminary Report, Draft Project Plan. Please include the salaries and benefits costs or City/Redevelopment Agency staff working on the Grantville Redevelopment Project.

HSA32

hank you for accepting these written comments regarding the Draft Environmental Impact teport for the Grantville Redevelopment Project. I look forward to your written response ddressing each of my concerns and comments.

Sincerely.

Holly Simonette
Grantville Resident

cc. All Members of the San Diego City Council Michael Aguirre, City Attorney P. Lamont Ewell, City Manager

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA30:

The conclusion that the Transit-Oriented Development Alternative would generate less average daily trips than the existing community plan land uses is based on applying the trip generation factors as identified in the City's Trip Generation Manual associated with each land use. A net decrease of average daily trips is expected because although there would be an increase in residential uses, there would be a decrease (i.e., these uses would be replaced), of industrial and commercial uses.

Please also refer to response to comments HSA28 and HSA29.

Response to Comment H\$A31:

The information requested by the commentor is public information and is available at the City Clerk's office.

Response to Comment H\$A32:



Public Comment

My name is Holly Simonette, and I'm a

Homeowner at 4838 Elsa Road, San Diego, 92120 (between Subareas A and C)

Honorable Mayor Murphy and Council Members:

HSB1

Thank you for allowing me to speak today about my concerns related to the Grantville Redevelopment Project and the Draft EIR. Council Members Frye and Atkins, my comments also relate to the ongoing lack of government transparency and the community's right to know.

HSB2

The entire community of Grantville and Allied Gardens has the been kept in the dark about what the City's Redevelopment Agency and private developers are trying to do in our neighborhoods. Those of us who live near the project area have not received updates or notices, and have had to find out information on our own or by word of mouth. Talk about secrecy at City Hall.

HSB3

I am here today with petitions in opposition to the Grantville Redevelopment Project. They are signed by my neighbors and local business owners who live and work near the Subareas. My neighbors and I are continuing to gather signatures. We respectfully request that you stop the project immediately.

HSB4

I am also here today to address concerns about the Draft EIR. The project description on page 3-6 says that the Project will serve as a catalyst to reverse the physical and economic blight in the area. What blight? How can you say there's blight when housing prices in our neighborhood have gone up 23.5 percent in the last year and the median price is over \$530,000?

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED JANUARY 25, 2005

Response to Comment HSB1:

Comment noted.

Response to Comment HSB2:

The Agency has complied with all public noticing requirements with respect to the California Environmental Quality Act and the California Community Redevelopment Law. In addition, the Agency has formed the Grantville Redevelopment Advisory Committee (GRAC). The formation of the GRAC is not a requirement for the formation of a redevelopment project area when no residential uses are involved. The GRAC was formed as an additional mechanism to encourage public involvement, and includes representation from portions of the community located outside of the Project Area. In addition to all noticing and meetings, all documentation related to this project has been posted on the Redevelopment Agency's website.

Response to Comment HSB3:

Comment noted. The referenced petition is included as an attachment to this responses to comments document.

Response to Comment HSB4:

Please refer to response to comment HSA27. The commentor also references housing prices. However, there is no residential use located within the Project Area.

RTC-107

most. In fact, people already drive on Twain and Crawford near my house to avoid the traffic mess on Mission Gorge. Your own highly paid experts say the Redevelopment Project would add more than 31,000 cars along Mission Gorge and Friars Roads and other areas of the project. But they note that even with some road improvements, "the cumulative impact would remain significant and unavoidable." This means even more cars will be driving through my neighborhood to avoid the increased traffic congestion on Mission Gorge. That puts more kids at risk for being hit by a car, more accidents, and more car exhaust around our schools. In short, there's going to be more traffic in my

We all know traffic in the area is bad – it's the thing people complain about the

HSB6

HSB5

Your experts' analysis of the long-term effects on the air quality concludes that "combined emissions from the Redevelopment Project Area and other developed areas in the Basin are expected to continue to exceed state and federal standards in the near term and emissions associated with these developments will exceed threshold levels." In short, more vehicles and industry in the Redevelopment Project Area will keep the air quality unhealthy in our neighborhoods.

neighborhood because traffic on Mission Gorge is going to stay screwed up.

HSB7

Honorable Mayor Murphy, Council Members, please do not ignore the findings of your own experts and put a rubber stamp of approval on this Draft EIR or the Grantville Redevelopment Project. There's no reason to screw up traffic and air quality even more for a project that has no justification in the first place, because there is no blight.

Thank you.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED JANUARY 25, 2005 (cont.d)

Response to Comment HSB5:

Please refer to responses to comment DOT3 and DRS17.

Response to Comment HSB6:

Please refer to response to comment HSA15, LM5, and CLB7.

Response to Comment HSB7:

Comment noted.

RTC-108

Sent by: City of S.D. Commun Econ Dev 619 533 5270;

02/14/05 2:51PM; JetFax_#977; Page 11'12

HS (ATTACH.)

The College Area Community Council THE PRESIDENT'S PERSPECTIVE

The biggest hope for the College Community may lie in. Mission Gorge. The City Redevelopment Agency is starting the process of a Grantville redevelopment project. Good news for them, but maybe better news for us because Grantville has the positive distinction of being one trolley stop away from the heart of SDSU. The large number of students driving to and from SDSU causes a lot of cangestion on our arterials. While several local projects will provide relief by adding housing within walking distance of campus, it is not enough to house all of SDSU's 34,000 students. Grantville redevelopment offers the opportunity for much more housing virtually on the doorstep of SDSU. An affordable housing component next to the wolkey theere would allow students to roll out of bed and onto a train that drops them off in the heart of Aziecland. Our Mayor and Council are advocates of smart growth along nejor transit corridors. What could be smarter than that?

Steve Laub

the Councilmenther representang blastric? 7. Let me begin by offering my thanks to the votes for re-decting and it is an honor to serve. This as orthwheel beaause my job is working to make the City I was born in the very general control of the councilmenther and the job seven days a week-from the job is working to make the City I was born in the very general control of the councilmenther and the job seven days a week-from the job is working to make the City I was born in the very general city Councilmenther and the job seven days a week-from resigned when you late - to de wortything I can to improve our neighborhoods and our quality of life.

We're facing die City and the Gity's passion asystem and the City's frames in general.

We're facing die City's audited financial statements completed.

We're facing die City's audited financial statements completed.

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A' Octing the City's audited financial statements completed and City Council goices. procedures and changes to the municipal code and City Council policies, to implement the five-year trial 'strong Mayor/Gity Council form of government that goes into effect next, January 1.

Pleaseworther weeking the completed of the good of regarding elections as Dristing of Press into effect next, January 1.

Pleaseworther policies, procedures and changes to the municipal code and City Council form of government that goes into effect next, January 1.

Pleaseworther weeking the work of the goes are enforced and other working the good in a desired policies to implement the five-year trial 'strong buyen the working the good is one of that we have fibraries that provide issues that the good is one of that we have fibraries that provide the basis gornes of that we have such any provides the basis gornes of the working the good is a declared provide the basis government, and the City to ranker that borne and property codes are enforced and other reliable source of week, then hone and commentation to easily government in Secretanence is an operation of the state govern

is currently a convoluted section of twists and turns where traffic hocks up routinely will become a more direct and efficient traffic flow area. This iong-team transformation is to change what is a rock quarry and light industrial area turn a ho-test man dhigh-team brothetion area.

Residents are channoring for unsightly utility lines to be moved underground. The visual improvement is beyond compare. Newer residential erees automatically had lines installed underground when the development took place. Older naighborhoods didn't have that option until now. The City has embacked on a 20-year plan to rid our stress of those ugly utility poles and wires. I am so pround of working with this Gity Council that has had the vision and foresight to accomplish this 1 only wish we could accomplish this in a short amount of thin.

Our next median projects are in the College, Rolando and El Cerrito areas on El Cajon Boulevard from 72rd Street to 54th Sireet. Also, this year we'll install a new irrigation system for the trees on the Mission Groge Road median heaven Princess View Drive and Margerum Avenue. Phase Pwo of that project includes an ewire rigulation system and planting resea in the Mission Groge Road median between Margerum Avenue and Jackson Drive. These median project includes an ewire rigulation system and planting trees in the Mission Groge Bain editin between Margerum Avenue and Jackson Drive. These median project including between Margerum Avenue and Jackson Drive. These median we've compliced over the last four years. The value of these new ball fadle has been criniched by the somments I hear from children and their parents. I creating strong generate butts and the gring of successes with the joint-case ball fields we've compliced over the last four years. The value of these new ball fields has been crinichating lack of funds — as the reasons why we finished installing grass or including lack of funds — as the reasons why we finished installing grass or including a proposed haseball and golf learning conturn

Straight From Jim

We are in the very early stages of planning for a park in the Fox Canyon neighborhood. The community is eliated and so an 1. The Buttle Cateway Project will break ground this morth and finably new sidewalks, traffic improvements and new handesaping will be added proved the staffic improvements and new handesaping will be added. The new College-Rhelando Library opens early this year. I'll let you know when the dedication takes place once west the date. Please join us sifyou can because it will be so exciting to have a brand new library, no our district. Once again we've les na ambitious list of goals. However, considering our frack record, I know we'll be checking each item off as completed. I know we'll be checking each item off as completed. As a wower, it is an horior to serve you. Please stay in outh, I invote you many wonderful poyeteds and venetic taking place in my District and in the eity as a whole. To then sign up by visiting my Web situ to http://dismal.nd. in the eity as a whole. To then sign up by visiting my Web situ to http://dismal.com/what also has videos of events and projects happening in the serve. I sak you to keep me almorred of insure as you see them. You may call my office at (619) 226-66(77) or write me t. Gity Hall, LIZE C Street, San Diepte, CA 92101) or send an email to JMAdaffer-gen

HS (ATTACH.)

RTC-110

JUST SAY "NO" TO THE GRANTVILLE REDEVELOPMENT PROJECT

Hand-delivered January 2005

Dear Neighbor:

Did you know the City of San Diego is planning to declare the area around our homes a "blighted area," create more traffic on Mission Gorge and Waring Roads, develop low-income housing in our area, take away property from local business owners. And they want to do all of this in violation of State law? It's time to tell the City Council "NO" - the residents of Grantville do NOT want the Grantville Redevelopment Project.

Make sure your voice is heard. The City Council will only pay attention if enough of us show up and make our voices heard. Sign the petition and attend the City Council meeting on January 25, 2005 at 10 a.m. (Council Chambers, 12th Floor, City Administration Building, 202 C Street, downtown).

The Grantville Redevelopment Project would:

Make Traffic Congestion Worse: The Draft Environmental Impact Report (EIR) predicts significant traffic increases in the area from the Project Activities, but does not propose anything to alleviate the traffic. No improvements are proposed for the bottle-neck on Mission Gorge Road between I-8 and Friars Road. This means even more traffic through our neighborhoods.



HSLM2

HSLM1

Declare Area Around Our Homes "Blighted": The City says this won't affect our property values, but we have no assurance of this. They say that values typically increase, but this is for areas that truly are blighted—ours is NOT!

HSLM3

Violate State Law: The proposal of this Project Area VIOLATES state law: Our area is NOT blighted by definition of California state law! How much more illegal activity should we tolerate from this city government?

HSLM4

> Take Away Property: Redevelopment will give the City extraordinary powers to take property away from business owners in order to make way for pet projects from developers like Fenton Development, who has an employee sitting as Chair of the planning committee! Don't let the City put your neighbors out of business just for their own convenience.

> Build Low-Income Housing: This places additional strain on social services in the area while taking money away from the very agencies that provide the services. This will result in reduced services and worse conditions for low-income residents.

HSLM5 4SLM6

> Take Money Away from Schools: This project will take money away from other governmental agencies, schools, and community colleges-all of which provide valuable services to our community. They're doing this simply because they can't manage their own finances!

HSLM7

Everything that the City proposes to do to improve our area are things they should already be doing--like improving landscaping and enforcing code violations.

Redevelopment simply becomes a vehicle to do things that the community has repeatedly said "No!" to, HSLM8 like high-density housing, new development in open spaces, and more congestion! If they aren't doing their jobs now, why would they when they get more power by forming a Redevelopment Area?

City documents about the Grantville Redevelopment Project are on the Internet: http://www.sandiego.gov/redevelopment-agency/grantville.shtml. Read them! Get informed!

- o Draft Redevelopment Plan
- o Draft Environmental Impact Report
- o Rules Governing Participation by Property Owners
- o Address Ranges for Properties within the Proposed Redevelopment Project Area

Please contact us if you have any questions.

Holly Simonette Homeowners on Elsa Road (619) 501-7414

Lvnn Murray Homeowner on Carthage Street (619) 582-1024

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE/LYNN MURRAY, **DATED JANUARY 2005**

Response to Comment H\$LM1:

Please refer to responses to comments DOT3, AG1, RM3 and DRS17.

Response to Comment H\$LM2:

Research indicates that between 2002-03 and 2003-04 the assessed value of properties in the Project Area increased 4.97% and between 2003-04 and 2004-05 increased 7.59%. This compares with 10.01% and 10.38% in the City of San Diego, and 9.92% and 11.15% in the County of San Diego. This is an indicator that property within the Project Area suffers from blighting conditions that are not present elsewhere.

Response to Comment H\$LM3:

The Preliminary Report for the Grantville Redevelopment Project Area documents the existence of blighting conditions in the Project Area. Not all properties in the Project Area are blighted by blighting conditions do exist and private enterprise acting alone has not addressed these conditions. Please also refer to responses to comments DD2, DD6, JN10, and HSA27.

Response to Comment HSLM4:

The Redevelopment Plan allows the Agency to acquire property in the Project Area only after extending Owner Participation preferences to existing owners and businesses, and only after paying just compensation based upon an appraisal of the property at its highest and best use.

Response to Comment HSLM5:

Affordable housing is a documented need throughout the City of San Diego and the region. The claim that such housing places additional strain on social services while taking money away from the very agencies that provides the services is not substantiated.

Response to Comment H\$LM6:

Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. In the case of school districts (K-14), a portion of the tax increment paid to the district is not deemed "property taxes" for the purposes of their financing pursuant to State law, and therefore, it is funding beyond what the school district would otherwise receive had there been no redevelopment project area. This new source of school funding is available to be used for education facilities that benefit the Project Area. With regard to other taxing entities, it is probable that with redevelopment activities enhancing the

RTC-111

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE/LYNN MURRAY, DATED JANUARY 2005 (cont.d)

Response to Comment HSLM6 (cont.d):

area, the growth in assessed value will exceed what would have occurred absent the Redevelopment Plan so even though these entities will receive only a portion of the tax increment, it could exceed what they would have received absent adoption of the Redevelopment Plan.

Response to Comment HSLM7:

Comment noted.

Response to Comment HSLM8:

Significant, Mitigable Impacts

Implementation of the proposed Redevelopment Project will result in significant impacts as a result of future redevelopment activities that will occur within the Project Area. Significant impacts have been identified to the following environmental issue areas:

- Air Quality (Short-term Construction)
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Public Services

Implementation of proposed Mitigation Measures identified in this Program EIR will reduce the impact to these resource areas to a level less than significant.

Significant, Unavoidable Impacts

Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)

Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

Grantville Redevelopment Project Draft Program EIR ES-4

December 13, 2004



THE CITY OF SAN DIEGO

DATE OF NOTICE: January 5, 2005

NOTICE OF PUBLIC HEARING

REDEVELOPMENT AGENCY, COMMUNITY AND ECONOMIC DEVELOPMENT

DATE OF HEARING: TIME OF HEARING:

January 25, 2005 10:00 AM

LOCATION OF HEARING:

Council Chambers, 12th Floor, City Administration Building, 202 C Street, San Diego, California 92101 Grantville Redevelopment Project Area (Proposed)

PURPOSE OF HEARING:

PROJECT:

Receive public testimony and comments regarding a draft programmatic Environmental Impact Report Navajo, Tierrasanta, and College Area

COMMUNITY PLAN AREA: COUNCIL DISTRICT:

District 7

The San Diego Redevelopment Agency is pursuing the Grantville Redevelopment Project which would eliminate physical and economic blighting conditions and promote a variety of land uses, expand employment opportunities, improve public infrastructure, parking, and services. California Community Redevelopment Law (Health and Safety Code Section 33000 et. seq.) controls redevelopment activity and the Draft Grantville Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA).

The Redevelopment Agency has scheduled a meeting on Tuesday, January 25, 2005 at 10:00 a.m. to take public testimony and comments on the draft programmatic EIR. A final EIR incorporating public input will be prepared for consideration by the Redevelopment Agency for a noticed public meeting in the future.

The draft programmatic EIR can be reviewed at www.sandiego.gov/redevelopment-agency/grantville and at the following locations: City of San Diego Redevelopment Agency, 600 B Street, 4th Floor; City of San Diego Central Library (Science & Industry Section), 820 E Street; Mission Valley Branch Library, 2123 Fenton Parkway; Tierrasanta Library, 4985 La Cuenta Drive; Benjamin Branch Library, 5188 Zion Avenue; San Carlos Branch Library, 7265 Jackson Drive; and the Navajo Community Service Center, 7381 Jackson Drive.

For additional information, contact Tracy Reed, Project Manager, at the Redevelopment Agency at (619) 533-7519 or treed@sandiego.gov.

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